

Prison Rape Elimination Act (PREA) Audit Report Adult Prisons & Jails

Final Report

Date of Report: September 2, 2020

Auditor Information

Name: Brian D. Bivens

Email: briandbivens@gmail.com

Company Name: Brian D. Bivens and Associates

Mailing Address: P.O. Box 51787

City, State, Zip: Knoxville, TN 37950

Telephone: 865-789-1037

Date of Facility Visit: August 20-21, 2020

Agency Information

Name of Agency:

Williamson County Sheriff's Office

Governing Authority or Parent Agency (If Applicable):

N/A

Physical Address: 408 Century Court, Franklin, TN 37064

City, State, Zip:

Mailing Address: Same

City, State, Zip:

The Agency Is:

☐ Military

☐ Private for Profit

☐ Private not for Profit

☐ Municipal

☒ County

☐ State

☐ Federal

Agency Website with PREA Information: <http://www.williamsoncounty-tn.gov/1741/PREA-Info>

Agency Chief Executive Officer

Name: Sheriff Dusty Rhoades

Email: dusty.rhoades@williamsoncounty-tn.gov

Telephone: 615-790-5560

Agency-Wide PREA Coordinator

Name: Sean Luther

Email: sean.luther@williamsoncounty-tn.gov

Telephone: 615-790-5560 ext - 3265

PREA Coordinator Reports to:

Lt. Chad Youker

Number of Compliance Managers who report to the PREA Coordinator: 0

Facility Information

Name of Facility: John I. Easley Criminal Justice Center

Physical Address: 408 Century Court

City, State, Zip: Franklin, Tennessee 37064

Mailing Address (if different from above):
N/A

City, State, Zip: N/A

The Facility Is:

☐ **Military**

☐ **Private for Profit**

☐ **Private not for Profit**

☐ **Municipal**

☒ **County**

☐ **State**

☐ **Federal**

Facility Type:

☐ **Prison**

☒ **Jail**

Facility Website with PREA Information: <http://www.williamsoncounty-tn.gov/1741/PREA-Info>

Has the facility been accredited within the past 3 years? ☒ **Yes** ☐ **No**

If the facility has been accredited within the past 3 years, select the accrediting organization(s) – select all that apply (N/A if the facility has not been accredited within the past 3 years):

☐ **ACA**

☐ **NCCHC**

☐ **CALEA**

☒ **Other (please name or describe: Tennessee Corrections Institute**

☐ **N/A**

If the facility has completed any internal or external audits other than those that resulted in accreditation, please describe:
N/A

Warden/Jail Administrator/Sheriff/Director

Name: Captain Mike Dobbins – Jail Administrator

Email: mike.dobbins@williamsoncounty-tn.gov

Telephone: 615-790-5560

Facility PREA Compliance Manager

Name: N/A

Email:

Telephone:

Facility Health Service Administrator ☐ N/A

Name: Jennifer Elam

Email: 7078@shpjailmedical.com

Telephone: 615-790-5560

Facility Characteristics

Designated Facility Capacity:	454	
Current Population of Facility:	204	
Average daily population for the past 12 months:	345	
Has the facility been over capacity at any point in the past 12 months?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Which population(s) does the facility hold?	<input type="checkbox"/> Females <input type="checkbox"/> Males <input checked="" type="checkbox"/> Both Females and Males	
Age range of population:	18-65	
Average length of stay or time under supervision:	23 days	
Facility security levels/inmate custody levels:	Minimum, Medium and Maximum	
Number of inmates admitted to facility during the past 12 months:	7,414	
Number of inmates admitted to facility during the past 12 months whose length of stay in the facility was for 72 hours or more:	1,832	
Number of inmates admitted to facility during the past 12 months whose length of stay in the facility was for 30 days or more:	756	
Does the facility hold youthful inmates?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Number of youthful inmates held in the facility during the past 12 months: (N/A if the facility never holds youthful inmates)	Click or tap here to enter text. <input checked="" type="checkbox"/> N/A	
Does the audited facility hold inmates for one or more other agencies (e.g. a State correctional agency, U.S. Marshals Service, Bureau of Prisons, U.S. Immigration and Customs Enforcement)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
<p>Select all other agencies for which the audited facility holds inmates: Select all that apply (N/A if the audited facility does not hold inmates for any other agency or agencies):</p>	<div style="list-style-type: none; padding-left: 0;"> <input type="checkbox"/> Federal Bureau of Prisons <input type="checkbox"/> U.S. Marshals Service <input type="checkbox"/> U.S. Immigration and Customs Enforcement <input type="checkbox"/> Bureau of Indian Affairs <input type="checkbox"/> U.S. Military branch <input type="checkbox"/> State or Territorial correctional agency <input checked="" type="checkbox"/> County correctional or detention agency <input type="checkbox"/> Judicial district correctional or detention facility <input type="checkbox"/> City or municipal correctional or detention facility (e.g. police lockup or city jail) <input type="checkbox"/> Private corrections or detention provider <input type="checkbox"/> Other - please name or describe: Click or tap here to enter text. <input type="checkbox"/> N/A </div>	
Number of staff currently employed by the facility who may have contact with inmates:	350	

Number of staff hired by the facility during the past 12 months who may have contact with inmates:	53
Number of contracts in the past 12 months for services with contractors who may have contact with inmates:	2
Number of individual contractors who have contact with inmates, currently authorized to enter the facility:	11
Number of volunteers who have contact with inmates, currently authorized to enter the facility:	195
Physical Plant	
Number of buildings: Auditors should count all buildings that are part of the facility, whether inmates are formally allowed to enter them or not. In situations where temporary structures have been erected (e.g., tents) the auditor should use their discretion to determine whether to include the structure in the overall count of buildings. As a general rule, if a temporary structure is regularly or routinely used to hold or house inmates, or if the temporary structure is used to house or support operational functions for more than a short period of time (e.g., an emergency situation), it should be included in the overall count of buildings.	4
Number of inmate housing units: Enter 0 if the facility does not have discrete housing units. DOJ PREA Working Group FAQ on the definition of a housing unit: How is a "housing unit" defined for the purposes of the PREA Standards? The question has been raised in particular as it relates to facilities that have adjacent or interconnected units. The most common concept of a housing unit is architectural. The generally agreed-upon definition is a space that is enclosed by physical barriers accessed through one or more doors of various types, including commercial-grade swing doors, steel sliding doors, interlocking sally port doors, etc. In addition to the primary entrance and exit, additional doors are often included to meet life safety codes. The unit contains sleeping space, sanitary facilities (including toilets, lavatories, and showers), and a dayroom or leisure space in differing configurations. Many facilities are designed with modules or pods clustered around a control room. This multiple-pod design provides the facility with certain staff efficiencies and economies of scale. At the same time, the design affords the flexibility to separately house inmates of differing security levels, or who are grouped by some other operational or service scheme. Generally, the control room is enclosed by security glass, and in some cases, this allows inmates to see into neighboring pods. However, observation from one unit to another is usually limited by angled site lines. In some cases, the facility has prevented this entirely by installing one-way glass. Both the architectural design and functional use of these multiple pods indicate that they are managed as distinct housing units.	21
Number of single cell housing units:	2
Number of multiple occupancy cell housing units:	12
Number of open bay/dorm housing units:	7
Number of segregation cells (for example, administrative, disciplinary, protective custody, etc.):	62
In housing units, does the facility maintain sight and sound separation between youthful inmates and adult inmates? (N/A if the facility never holds youthful inmates)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
Does the facility have a video monitoring system, electronic surveillance system, or other monitoring technology (e.g. cameras, etc.)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Has the facility installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology in the past 12 months?		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Medical and Mental Health Services and Forensic Medical Exams		
Are medical services provided on-site?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Southern Health Partners	
Are mental health services provided on-site?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Southern Health Partners	
Where are sexual assault forensic medical exams provided? Select all that apply.	<input type="checkbox"/> On-site <input checked="" type="checkbox"/> Local hospital/clinic Williamson Medical Center <input type="checkbox"/> Rape Crisis Center <input type="checkbox"/> Other (please name or describe: Click or tap here to enter text.)	
Investigations		
Criminal Investigations		
Number of investigators employed by the agency and/or facility who are responsible for conducting CRIMINAL investigations into allegations of sexual abuse or sexual harassment:	12	
When the facility received allegations of sexual abuse or sexual harassment (whether staff-on-inmate or inmate-on-inmate), CRIMINAL INVESTIGATIONS are conducted by: Select all that apply.	<input type="checkbox"/> Facility investigators <input checked="" type="checkbox"/> Agency investigators <input type="checkbox"/> An external investigative entity	
Select all external entities responsible for CRIMINAL INVESTIGATIONS: Select all that apply (N/A if no external entities are responsible for criminal investigations)	<input type="checkbox"/> Local police Office <input checked="" type="checkbox"/> Local sheriff's Office <input type="checkbox"/> State police <input type="checkbox"/> A U.S. Office of Justice component <input type="checkbox"/> Other (please name or describe: Click or tap here to enter text.)	
Administrative Investigations		
Number of investigators employed by the agency and/or facility who are responsible for conducting ADMINISTRATIVE investigations into allegations of sexual abuse or sexual harassment?	4	
When the facility receives allegations of sexual abuse or sexual harassment (whether staff-on-inmate or inmate-on-inmate), ADMINISTRATIVE INVESTIGATIONS are conducted by: Select all that apply	<input type="checkbox"/> Facility investigators <input checked="" type="checkbox"/> Agency investigators <input type="checkbox"/> An external investigative entity	
Select all external entities responsible for ADMINISTRATIVE INVESTIGATIONS: Select all that apply (N/A if no external entities are responsible for administrative investigations)	<input type="checkbox"/> Local police Office <input checked="" type="checkbox"/> Local sheriff's Office <input type="checkbox"/> State police <input type="checkbox"/> A U.S. Office of Justice component <input type="checkbox"/> Other (please name or describe: Click or tap here to enter text.)	

Audit Findings

Audit Narrative

The onsite PREA audit of the John I. Easley Criminal Justice Center was conducted August 20-21, 2020, by Office of Justice Certified PREA Auditor Brian D. Bivens. Williamson County is situated in middle Tennessee. The county seat is Franklin. The county was named after Hugh Williamson, a politician from North Carolina who signed the United States Constitution; Mr. Williamson also served three terms in the Continental Congress. According to the 2010 census, there were 183,182 people residing in Williamson County.

Pre-audit preparation included a thorough review of all policies, procedures, training curriculums, Pre-Audit Questionnaire, and supporting documentation provided by the facility to demonstrate compliance to the PREA standards. The auditor and the PREA Coordinator had ongoing communication for several weeks prior to the audit to prepare for the on-site visit. The Auditor did not complete an initial on-site review prior to the audit.

The auditor wishes to extend his deepest appreciation to Sheriff Dusty Rhoades and Jail Administrator Captain Mike Dobbins and their staff for their professionalism, hospitality, and kindness. The auditor appreciated the group effort approach in establishing the zero tolerance environment in the jail. The auditor also wishes to compliment the John I. Easley Criminal Justice Center's PREA Coordinator Sean Luther for his outstanding work in organizing the files that were provided to the auditor in advance of the audit. This enabled the audit to move forward very efficiently.

The on-site audit began with an entrance meeting being conducted on Thursday, August 20, 2020 at 08:30 a.m. in the Sheriff's Office Training Room. The following staff attended the entrance meeting:

Sheriff Dusty Rhoades

Captain Mike Dobbins, Jail Administrator

Sean Luther, PREA Coordinator

Lt. Chad Youker

Following the entrance meeting, the auditor conducted a comprehensive site review that began at approximately 09:00 a.m. and continued throughout the onsite visit. During the site review the auditor reviewed camera placement, blind spots, staff placement and documentation to assist in determining standard compliance. While touring the facilities the auditor observed the notices of this PREA audit in the main public lobby; as well as, all the housing units, as well as posters (Speak Up) that called attention to the agency's Zero Tolerance Policy and how to report allegations of sexual abuse and sexual harassment. Random staff and resident interviews were conducted in private areas (Office and Interview Room). The following staff accompanied the auditor on the site review:

Sean Luther, PREA Coordinator

Lt. Chad Youker

All housing units, day rooms, resident program areas, work areas, and all other resident accessible areas were toured. Other accessible areas included the Kitchen, Laundry, Inmate Worker Housing, Classrooms, Recreation Yards, Lobby, Administrative Area, Medical, Intake and Sallyport. While touring several inmates and staff were questioned about their knowledge of PREA standards, procedures for reporting, services available, and their responsibilities. All staff and residents informally interviewed during the tour acknowledged receiving training and procedures for reporting sexual abuse, sexual harassment, and/or retaliation for reporting. The auditor found the staff to be well versed in their duties as PREA 1st Responders.

The auditor interviewed a total of thirty staff members during the course of this audit. **(See Chart 1)** All staff interviewed was well versed in their respective areas of responsibility regarding PREA and affirmed compliance with the applicable PREA standards. There is no SAFE or SANE staff at the facility; they are would be performed at Williamson Medical Center. The Williamson County Sherriff's Office has entered into a Memorandum of Understanding with Sexual Assault Center of Nashville to provide for Victim Advocate Services. Staff interviewed was well versed in their responsibilities in reporting sexual abuse, sexual harassment, staff negligence, and retaliation for reporting. It was clear the staff received and understood training on how to communicate with LGBTI inmates, how to avoid appropriate relations with inmates and how they could privately report sexual abuse. When questioned about evidence preservation, all staff responses reflected knowledge of agency policies and procedures. Staff are issued a First Responder Card, which is kept on their person at all times.

Chart 1 - Staff/Contractor/Volunteer Interviews (30)

Interview Type	Number Interviewed	Additional Information
Volunteer	2	
Contractor	2	Southern Health Partners
Supervisors	3	
1 st Responder	2	
Agency Head/Designee	1	Jail Administrator
Facility Head/Designee	1	Jail Administrator
Medical Staff	1	Medical Team Leader
Mental Health Staff	1	RN
PREA Coordinator	1	
PREA Manager	0	N/A
1 st Shift Random Staff	5	
2 nd Shift Random Staff	3	
3 rd Shift Random Staff	2	
PREA Investigator	1	
Screening Staff	1	
Human Resources	1	
Training Staff	1	
Juvenile Staff	0	N/A
Segregation Staff	1	
Intake Staff	1	

The facility supplied a list of resident names sorted by housing units, disabilities, and special designations, as well as a list of facility staff names to the auditor. From these lists the auditor selected, at random, a sampling of residents and staff to be interviewed during the on-site visit. This decision was made to ensure all residents throughout the facility were receiving the same information and education related to all aspects of the PREA program instituted at this facility.

There were twenty inmates interviewed during the on-site visit (**See Chart 2**). All of the inmates interviewed acknowledged receiving PREA training and written materials in languages that they could comprehend (posters, pamphlets, and resident handbooks) outlining the agencies zero tolerance policies towards sexual abuse, sexual harassment, and retaliation for reporting, as well as the procedures for reporting. There were two out of twenty inmates did not remember if they had been screened during the intake process. Records check showed all inmates were screened within 72 hours of intake. Records indicate the PREA video is played routinely in the housing areas; nineteen out of twenty inmates indicated they had watched the PREA video. All inmates interviewed felt if they had to file a PREA complaint the facility would respond appropriately to their complaint and that all PREA complaints were taken very serious by staff at this facility. All inmates stated they felt safe in the facility.

There were twenty inmates interviewed during the on-site visit. These residents consisted of: ten general population inmates and ten targeted interviews.

Chart 2 - Inmate Interviews (20) [16 males and 4 females]

Interview Type	Number Interviewed	Additional Information
General Population	4	
Juvenile	0	N/A
LEP	4	
Blind/Low Vision	0	None in custody during onsite visit
Deaf/Hearing Impaired	0	None in custody during onsite visit
Self-Identified as LBGTQ	1	Transgender
Physical/Mental Disability	3	
Reported Sexual Abuse	4	
Screened as Victim/Aggressor	4	

The auditor selected and carefully examined 10 human resource and training files, 2 contract employee and 2 volunteer files. The personnel and training files were very well organized and contained all the necessary background check information and signed statements regarding previous sexual misconduct described in the standards. There were two instances where the Williamson County Sheriff's Office request information from previous institutional employers. The training records were also very complete and included written documentation that staff and volunteers received the required training and understood what was being trained. It was clear the PREA Coordinator thoroughly covers all aspects of PREA during her training sessions.

The auditor also reviewed 10 offender files and saw documentation of offender education, as well as documentation of the initial risk screenings, and screenings upon additional information being

completed as required by the standard. Screening and reassessments are kept locked in the PREA Coordinator's office. Results of the assessments are only shared with Medical Staff and Shift Supervisors who make cell assignments.

In the 12 months preceding the audit, the John I. Easley Criminal Justice Center has had 45 complaints for sexual harassment, misconduct and sexual Abuse. **(See Chart 3)**. One sexual abuse investigation resulted in termination of employee, and referral for prosecution. The second (inmate on inmate) is still pending in the Grand Jury. Policy and forms are in place for documenting inmate notification, incident review and retaliations monitoring. Policy and procedure required that criminal investigative referrals were to be documented and proper referrals were made as warranted.

Breakdown of the PREA investigations in the past 12 months

SOI	Abuse/Misconduct	Substantiated	1
		Unsubstantiated	1
		Unfounded	6
	Harassment	Substantiated	0
		Unsubstantiated	2
		Unfounded	5
IOI	Abuse/Misconduct	Substantiated	0
		Unsubstantiated	0
		Unfounded	2
		Pending	1
	Harassment	Substantiated	1
		Unsubstantiated	18
		Unfounded	8

Chart 3 - PREA Investigation Files from the past 12 months (45)

Aggressor v. Victim	Case Type	Outcome	Disposition of Aggressor	Inmate Notified
SOI	Abuse/Misconduct	Substantiated	Terminated	Yes
IOI	Harassment	Unfounded	N/A	Yes
SOI	Harassment	Unfounded	N/A	Yes
SOI	Abuse/Misconduct	Unfounded	N/A	Yes
IOI	Harassment	Unfounded	N/A	Yes
IOI	Abuse/Misconduct	Unfounded	N/A	Yes
SOI	Abuse/Misconduct	Unfounded	N/A	Yes
SOI	Abuse/Misconduct	Unfounded	N/A	Yes
SOI	Harassment	Unfounded	N/A	Yes
SOI	Harassment	Unfounded	N/A	Yes
IOI	Abuse/Misconduct	Unfounded	N/A	Yes
IOI	Harassment	Unfounded	N/A	Yes
IOI	Harassment	Unsubstantiated	Released	Yes
SOI	Harassment	Unsubstantiated	N/A	Yes
IOI	Harassment	Unsubstantiated	Separated	Yes
IOI	Harassment	Unsubstantiated	Separated	Yes
IOI	Harassment	Unsubstantiated	Separated	Yes
IOI	Harassment	Unsubstantiated	Separated	Yes
SOI	Harassment	Unsubstantiated	N/A	Yes
IOI	Harassment	Unsubstantiated	Separated	Yes
IOI	Harassment	Unsubstantiated	Separated	Yes
SOI	Abuse/Misconduct	Unsubstantiated	N/A	Yes
IOI	Harassment	Unsubstantiated	Separated	Yes
IOI	Harassment	Unsubstantiated	Separated	Yes
IOI	Harassment	Substantiated	Separated	Yes
IOI	Harassment	Unfounded	Separated	Yes
IOI	Harassment	Unfounded	Separated	Yes
IOI	Harassment	Unfounded	Separated	Yes
IOI	Harassment	Unfounded	Separated	Yes
IOI	Harassment	Unsubstantiated	Separated	Yes
IOI	Harassment	Unsubstantiated	Separated	Yes
IOI	Harassment	Unsubstantiated	Separated	Yes
IOI	Harassment	Unsubstantiated	Separated	Yes
IOI	Harassment	Unsubstantiated	Separated	Yes
IOI	Harassment	Unsubstantiated	Separated	Yes
IOI	Harassment	Unsubstantiated	Separated	Yes
IOI	Harassment	Unsubstantiated	Separated	Yes
IOI	Harassment	Unsubstantiated	Separated	Yes
IOI	Harassment	Unsubstantiated	Separated	Yes
IOI	Harassment	Unsubstantiated	Separated	Yes
IOI	Harassment	Unsubstantiated	Separated	Yes
IOI	Harassment	Unsubstantiated	Separated	Yes
IOI	Harassment	Unsubstantiated	Separated	Yes
IOI	Harassment	Unsubstantiated	Separated	Yes
IOI	Harassment	Unsubstantiated	Separated	Yes
IOI	Abuse/Misconduct	Pending	Separated	Yes
SOI	Abuse/Misconduct	Unfounded	N/A	Yes
SOI	Harassment	Unfounded	N/A	Yes
SOI	Abuse/Misconduct	Unfounded	N/A	Yes
SOI	Abuse/Misconduct	Unfounded	N/A	Yes
SOI	Harassment	Unfounded	N/A	Yes

*IOI means Inmate on Inmate and SOI means Staff on Inmate

****It should be noted that a significant amount of allegations came from three separate inmates.**

At the conclusion of the on-site visit, an exit meeting was held on August 21, 2020 at approximately 2:30 p.m., to discuss the audit findings. The following staff attended:

Captain Mike Dobbins, Jail Administrator

Sean Luther, PREA Coordinator

Lt. Chad Youker

During the exit, the auditor explained the process that would follow the on-site visit. The auditor also explained any areas found not meeting the standards during the audit would require corrective measures and he would be working closely with the PREA team to accomplish compliance. The auditor again thanked the Sheriff and his team for their hard work ensuring that the John I. Easley Criminal Justice Center has a zero tolerance for sexual assault and sexual harassment. Finally, the auditor acknowledged the willingness of all staff involved to accomplish PREA compliance and advised the PREA team of their requirements to post the final report on the facility website once compliance with all standards was achieved.

Facility Characteristics

The John I. Easley Criminal Justice Center is certified for 454 inmates by the Tennessee Corrections Institute. Inmates housed at the facility are from every corner of Williamson County. John I. Easley Criminal Justice Center houses inmates from surrounding jurisdictions. The facility houses both male and female inmates; the facility does not house juvenile inmates. Custody levels include low, medium and maximum custody.

The facility has a tower centrally located in the housing areas; which is manned 24/7. The officer station in the tower has access to the facility cameras and can visible see into each housing unit. The officer cannot see into the shower/toilet areas. The toilet in the isolation arrears are marked out on camera view. The facility is comprised of multiple housing units (**See Chart 4**), with an intake and an inmate worker unit.

Chart 4 – John I. Easley Criminal Justice Center Housing

Name	Type	Capacity	Gender	Custody Level
Medical	Medical	4	Both	All
506	General Population	56	Female	All
508	L/D	15	Female	All
519	PC/Med	15	Female	All
111	Special Housing	12	Male	All
112	Special Housing	8	Male	All
110	Special Housing	6	Male	All
310	L/D	16	Male	All
309	L/D	25	Male	All
305	PC/Med	36	Male	All
314	General Population	26	Male	Pre-Trial
304	General Population	28	Male	Pre-Trial
363	General Population	28	Male	Pre-Trial
364	General Population	30	Male	Pre-Trial
607	General Population	15	Male	Sentenced
618	General Population	23	Male	Sentenced
633	General Population	15	Male	Sentenced
644	General Population	23	Male	Sentenced
659	Protective Custody	8	Male	Sentenced
671	General Population	23	Male	Sentenced
707	General Population	56	Male	Sentenced

****All showers and toilets have curtains that promote privacy.**

The facility utilizes an advanced camera system and has over 450 cameras. The auditor was impressed with the quality of the video. The facility also records all communications on the inmate intercoms locked in each cell. The facility video is recorded and stored up to 30-90 days.

Each pod has "Speak Up" posters and contact information for Sexual Assault Center of Nashville. The Williamson County Sheriff's Office has finalized a Memorandum of Understanding with Sexual Assault Center of Nashville; which is already providing counseling services for victims of sexual assault and is also accepting external phone calls from inmates from the facility. Inmates can call on the inmate phones to report sexual abuse to Brentwood Police Department Dispatch and they can also call an internal number to report sexual abuse or sexual harassment to the members of the SART team. The contact information is posted above the inmate phones in each housing unit.

Summary of Audit Findings

This facility has successfully must the necessary requirements for re-certification.

Standards Exceeded

Number of Standards Exceeded: 0

List of Standards Exceeded:

Standards Met

Number of Standards Met: 45

115.11, 115.12, 115.13, 115.14, 115.15, 115.16, 115.17, 115.18, 115.21, 115.22, 115.31, 115.32, 115.33, 115.34, 115.35, 115.41 115.42, 115.43, 115.51, 115.52, 115.53, 115.54, 115.61, 115.62, 115.63, 115.64, 115.65, 115.66, 115.67, 115.68, 115.71, 115.72, 115.73, 115.76, 115.77, 115.78, 115.81, 115.82, 115.83, 115.86, 115.87, 115.88, 115.89, 115.401, 115.403

Standards Not Met

Number of Standards Not Met: 0

List of Standards Not Met: [Click or tap here to enter text.](#)

PREVENTION PLANNING

Standard 115.11: Zero tolerance of sexual abuse and sexual harassment; PREA coordinator

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.11 (a)

- Does the agency have a written policy mandating zero tolerance toward all forms of sexual abuse and sexual harassment? ☒ Yes ☐ No
- Does the written policy outline the agency's approach to preventing, detecting, and responding to sexual abuse and sexual harassment? ☒ Yes ☐ No

115.11 (b)

- Has the agency employed or designated an agency-wide PREA Coordinator? ☒ Yes ☐ No
- Is the PREA Coordinator position in the upper-level of the agency hierarchy? ☒ Yes ☐ No
- Does the PREA Coordinator have sufficient time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards in all of its facilities?
☒ Yes ☐ No

115.11 (c)

- If this agency operates more than one facility, has each facility designated a PREA compliance manager? (N/A if agency operates only one facility.) ☐ Yes ☐ No ☒ NA
- Does the PREA compliance manager have sufficient time and authority to coordinate the facility's efforts to comply with the PREA standards? (N/A if agency operates only one facility.)
Yes ☐ No ☒ NA

Auditor Overall Compliance Determination

Exceeds Standard (*Substantially exceeds requirement of standards*)

X Meets Standard (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)

Does Not Meet Standard (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

Evidence Reviewed:

A. Documents

1. Williamson County Sheriff's Office Pre-Audit Questionnaire/Audit Files
2. PREA Compliance Audit Instrument Checklist
3. Williamson County Sheriff's Office General Order 10.6.002, page 3
4. Organizational Chart

B. Interview

1. PREA Coordinator

115.11 (a) The Williamson County Jail staff follows the Williamson County Sheriff's Office General Order 10.6.002 on Sexual Harassment/Sexual Abuse which mandates a zero tolerance for all forms of sexual abuse and sexual harassment. This General Order 10.6.002 page 3, outlines the agency's approach to preventing, detecting, and responding to such conduct. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.11 (B) and (C) The agency employs an upper-level, agency-wide PREA Coordinator. The Williamson County Job Description outlines the responsibilities of the PREA Coordinator. Sean Luther was appointed as the agency-wide PREA Coordinator by Sheriff Rhoades on March 23, 2019. The facility provided the auditor with the organizational chart showing the PREA Coordinator position as an upper-level, agency-wide position. The PREA Coordinator is very knowledgeable of the PREA standards and actively assists the facility with compliance. The PREA Coordinator has the authority to develop, implement, and oversee PREA compliance. He is actively updating the facility as new Frequently Ask Questions (FAQ's) results are published on the PREA Resource Center website. The Williamson County Sheriff's Office operates one jail facility; therefore, the agency does not have a PREA Manager.

During interviews with the PREA Coordinator, he indicated they had sufficient time and authority to coordinate the facility's efforts to comply with the PREA standards as required. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

Standard 115.12: Contracting with other entities for the confinement of inmates

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.12 (a)

- If this agency is public and it contracts for the confinement of its inmates with private agencies or other entities including other government agencies, has the agency included the entity's obligation to comply with the PREA standards in any new contract or contract renewal signed on or after August 20, 2012? (N/A if the agency does not contract with private agencies or other entities for the confinement of inmates.) ☐ Yes ☐ No ☒ NA

115.12 (b)

- Does any new contract or contract renewal signed on or after August 20, 2012 provide for agency contract monitoring to ensure that the contractor is complying with the PREA standards? (N/A if the agency does not contract with private agencies or other entities for the confinement of inmates.) ☐ Yes ☐ No ☒ NA

Auditor Overall Compliance Determination

- ☐ **Exceeds Standard** (*Substantially exceeds requirement of standards*)
- ☒ **Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- ☐ **Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

Evidence Reviewed:

- A. Documents
 1. Williamson County Sheriff's Office Pre-Audit Questionnaire/Audit Files
 2. PREA Compliance Audit Instrument Checklist
- B. Interviews
 1. Random Staff
 2. PREA Coordinator
- C. Other
 1. Auditor Observation

Based on the documentation provided, auditor observation, interview with the PREA Coordinator; as well as random staff interviews; it was determined the John I. Easley Criminal Justice Center does not contract with other facilities to house inmates assigned to their custody. Therefore, this standard was found to be compliant to this facility during this audit.

Standard 115.13: Supervision and monitoring

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.13 (a)

- Does the facility have a documented staffing plan that provides for adequate levels of staffing and, where applicable, video monitoring, to protect inmates against sexual abuse?

- In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Generally accepted detention and correctional practices? ☒ Yes ☐ No
- In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any judicial findings of inadequacy? ☒ Yes ☐ No
- In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any findings of inadequacy from Federal investigative agencies? ☒ Yes ☐ No
- In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any findings of inadequacy from internal or external oversight bodies? ☒ Yes ☐ No
- In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: All components of the facility's physical plant (including "blind-spots" or areas where staff or inmates may be isolated)? ☒ Yes ☐ No
- In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The composition of the inmate population? ☒ Yes ☐ No
- In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The number and placement of supervisory staff? ☒ Yes ☐ No
- In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The institution programs occurring on a particular shift? ☒ Yes ☐ No ☐ NA
- In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any applicable State or local laws, regulations, or standards? ☒ Yes ☐ No
- In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The prevalence of substantiated and unsubstantiated incidents of sexual abuse? ☒ Yes ☐ No
- In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any other relevant factors? ☒ Yes ☐ No

115.13 (b)

- In circumstances where the staffing plan is not complied with, does the facility document and justify all deviations from the plan? (N/A if no deviations from staffing plan.) ☒ Yes ☐ No ☐ NA

115.13 (c)

- In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The staffing plan established pursuant to paragraph (a) of this section? ☒ Yes ☐ No
- In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The facility's deployment of video monitoring systems and other monitoring technologies? ☒ Yes ☐ No
- In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The resources the facility has available to commit to ensure adherence to the staffing plan? ☒ Yes ☐ No

115.13 (d)

- Has the facility/agency implemented a policy and practice of having intermediate-level or higher-level supervisors conduct and document unannounced rounds to identify and deter staff sexual abuse and sexual harassment? ☒ Yes ☐ No
- Is this policy and practice implemented for night shifts as well as day shifts? ☒ Yes ☐ No
- Does the facility/agency have a policy prohibiting staff from alerting other staff members that these supervisory rounds are occurring, unless such announcement is related to the legitimate operational functions of the facility? ☒ Yes ☐ No

Auditor Overall Compliance Determination

- ☐ **Exceeds Standard** (*Substantially exceeds requirement of standards*)
- ☒ **Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- ☐ **Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

Evidence Reviewed:

A. Documents

1. Williamson County Sheriff's Office Pre-Audit Questionnaire/Audit Files
2. PREA Compliance Audit Instrument Checklist
3. Williamson County Sheriff's Office General Order 10.6.002, page 4
4. Staffing Plan
5. Employee Schedules/Rosters
6. Unannounced Round Documentation

B. Interviews

1. Jail Administrator

2. PREA Coordinator
3. Upper Level Supervisors conduction Unannounced Rounds

C. Other

1. Personal Observation during Site Review

The following delineates the audit findings regarding this standard:

115.13 (a) Williamson County Sheriff's Office General Order 10.6.002, page 4, states that the facility has documented and made its best efforts to comply on a regular basis with a staffing plan that provides for adequate levels of staffing as described and required by this standard. The staffing plan was establish in collaboration with the Sheriff, Jail Administrator and PREA Coordinator. The established staffing plan uses the criteria found in the standard 115.13 (a) to include the physical layout of the facility, composition of the residents housed, the prevalence of substantiated and unsubstantiated incidents of sexual abuse, and any other relevant factors identified. Video monitoring has been deployed to assist with the protection of offenders against sexual abuse at this facility. The staffing levels are monitored daily by review of shift rosters. Interview with the Jail Administrator confirmed this practice. The auditor observed that actual deployment practices reflects the deployment described in the staffing plan. During site review, the auditor observed staffing levels were adequate; considering the physical plant and duty posts. The staffing plan takes into consideration:

- Generally accepted detention and correctional practices;
- Any judicial findings of inadequacies (there were none at the time of the site review)
- Any findings of inadequacies from Federal investigation oversight agencies (there were none at the time of the site review)
- Any findings of inadequacy form internal or external oversight bodies (there were none at the time of the site review)
- All components of the facility's physical plant (Intake/Kitchen/Laundry)
- The composition of the inmate population (adult males and adult females only)
- The number and placement of supervisory staff (one per shift)
- Institution programs occurring on a particular shift (classroom)
- Any applicable State or local laws, regulation, or standards (Tennessee Corrections Institute Standards)
- The prevalence of substantiated and unsubstantiated incidents of sexual abuse, and
- Any other relevant factors.

Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.13 (b) The facility has procedures in place to ensure all deviations are covered by overtime or notification must be documented on shift roster and submitted to the Jail Administrator outlining the reason(s) for the deviation. There have been any deviations reported where the staffing plan had not been complied with in the past twelve months, as confirmed by written documentation and during interview with the Jail Administrator. Staff call outs are dealt with by giving staff overtime. The Jail Log Book would be utilized to document any deviations. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.13 (c) The staffing plan is reviewed annually by the PREA Coordinator and forwarded to the Jail Administrator and Sheriff for review and approval of any recommendations made which would

include changes to policy and procedures, physical plant, video monitoring, or staffing levels. This process is outlined in Williamson County Sheriff's Office General Order 10.6.002 page 4. The last Annual Staffing Plan assessment was completed August 18, 2020. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.13 (d) Based on John I. Easley Criminal Justice Center Shift Supervisor facility logs, staff interviews, Williamson County Sheriff's Office General Order 10.6.002 page 4, and other documentation provided. The on-duty supervisor is required to conduct and documenting UNANNOUNCED rounds on all shifts as required on the "Supervisor Unannounced Round Log". Rounds are conducted and documented at least once every shift. Rounds are completed each shift and three supervisors that were interviewed stated they change their routine or pattern each day to ensure that staff and inmates are not alerted. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

Standard 115.14: Youthful inmates

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.14 (a)

- Does the facility place all youthful inmates in housing units that separate them from sight, sound, and physical contact with any adult inmates through use of a shared dayroom or other common space, shower area, or sleeping quarters? (N/A if facility does not have youthful inmates [inmates <18 years old].) ☐ Yes ☐ No ☒ NA

115.14 (b)

- In areas outside of housing units does the agency maintain sight and sound separation between youthful inmates and adult inmates? (N/A if facility does not have youthful inmates [inmates <18 years old].) ☐ Yes ☐ No ☒ NA
- In areas outside of housing units does the agency provide direct staff supervision when youthful inmates and adult inmates have sight, sound, or physical contact? (N/A if facility does not have youthful inmates [inmates <18 years old].) ☐ Yes ☐ No ☒ NA

115.14 (c)

- Does the agency make its best efforts to avoid placing youthful inmates in isolation to comply with this provision? (N/A if facility does not have youthful inmates [inmates <18 years old].) ☐ Yes ☐ No ☒ NA
- Does the agency, while complying with this provision, allow youthful inmates daily large-muscle exercise and legally required special education services, except in exigent circumstances? (N/A if facility does not have youthful inmates [inmates <18 years old].) ☐ Yes ☐ No ☒ NA

- Do youthful inmates have access to other programs and work opportunities to the extent possible? (N/A if facility does not have youthful inmates [inmates <18 years old].)
☐ Yes ☐ No ☒ NA

Auditor Overall Compliance Determination

- ☐ **Exceeds Standard** (*Substantially exceeds requirement of standards*)
- ☒ **Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- ☐ **Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

Evidence Reviewed:

- A. Documents
 - 1. Williamson County Sheriff's Office Pre-Audit Questionnaire/Audit Files
 - 2. PREA Compliance Audit Instrument Checklist
- B. Interviews
 - 1. PREA Coordinator
- C. Other
 - 1. Auditor Observation

Based on the information provided and interviews with the Jail Administrator and the PREA Coordinator, the John I. Easley Criminal Justice Center is an all adult facility and does not house youthful offenders. Therefore, this standard was found to be in compliance to this facility during this audit.

Standard 115.15: Limits to cross-gender viewing and searches

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.15 (a)

- Does the facility always refrain from conducting any cross-gender strip or cross-gender visual body cavity searches, except in exigent circumstances or by medical practitioners?
☒ Yes ☐ No

115.15 (b)

- Does the facility always refrain from conducting cross-gender pat-down searches of female inmates, except in exigent circumstances? (N/A if the facility does not have female inmates.)
☒ Yes ☐ No ☐ NA
- Does the facility always refrain from restricting female inmates' access to regularly available programming or other out-of-cell opportunities in order to comply with this provision? (N/A if the facility does not have female inmates.) ☒ Yes ☐ No ☐ NA

115.15 (c)

- Does the facility document all cross-gender strip searches and cross-gender visual body cavity searches? ☒ Yes ☐ No
- Does the facility document all cross-gender pat-down searches of female inmates? (N/A if the facility does not have female inmates.) ☒ Yes ☐ No ☐ NA

115.15 (d)

- Does the facility have policies that enables inmates to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks? ☒ Yes ☐ No
- Does the facility have procedures that enables inmates to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks? ☒ Yes ☐ No
- Does the facility require staff of the opposite gender to announce their presence when entering an inmate housing unit? ☒ Yes ☐ No

115.15 (e)

- Does the facility always refrain from searching or physically examining transgender or intersex inmates for the sole purpose of determining the inmate's genital status? ☒ Yes ☐ No
- If an inmate's genital status is unknown, does the facility determine genital status during conversations with the inmate, by reviewing medical records, or, if necessary, by learning that information as part of a broader medical examination conducted in private by a medical practitioner? ☒ Yes ☐ No

115.15 (f)

- Does the facility/agency train security staff in how to conduct cross-gender pat down searches in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs? ☒ Yes ☐ No

- Does the facility/agency train security staff in how to conduct searches of transgender and intersex inmates in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs? ☒ Yes ☐ No

Auditor Overall Compliance Determination

Exceeds Standard (*Substantially exceeds requirement of standards*)

X Meets Standard (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)

Does Not Meet Standard (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

Evidence Reviewed:

- A. Documents
 1. Williamson County Sheriff's Office Pre-Audit Questionnaire/Audit Files
 2. PREA Compliance Audit Instrument Checklist
 3. Williamson County Sheriff's Office General Order 10.6.002, pages 6 and 7
 4. Training PowerPoint (Prison Rape Elimination Act {PREA} Employee Training and Sign-In Sheets
- B. Interviews
 1. Random Staff
 2. Random Inmates
- C. Other
 1. Observation during Site Review

The following delineates the audit findings regarding this standard:

115.15 (a) Williamson County Sheriff's Office General Order 10.6.002, pages 6 and 7 outlines offender searches including searches of transgender and intersex offenders. The review of Training PowerPoint (Prison Rape Elimination Act {PREA} Employee Training and staff interviews revealed cross gender strip searches are prohibited except in exigent circumstances and must be documented when conducted. The agency has logs to document exigent circumstances when appropriate. There have been no documented cross-gender visual body cavity or strip searches reported in the past 12 months. Ten out of ten random staff members interviewed, states they had not completed a cross-gender patdowns. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.15 (b) Williamson County Sheriff's Office General Order 10.6.002 page 6 prohibits male employees from frisk/pat searches of female inmates/residents except in exigent circumstances. Interviews with random staff confirm this practice. Therefore, the facility demonstrated compliance with this part of the standard during this audit. The PREA Coordinator confirmed there were no

occasions were male employees searched any female inmate, either frisk/pat or strip-search. Twenty out of twenty random inmates interviewed, confirmed this practice. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.15 (c) Williamson County Sheriff's Office General Order 10.6.002 page 6 prohibits frisk/pat searches of the female inmates by male staff and requires that all cross-gender searches in exigent circumstances be documented. The agency has logs to document exigent circumstances when appropriate. The PREA Coordinator confirmed there were no occasions were either frisk/pat or strip-search completed under exigent circumstances in the past 12 months. Twenty out of twenty inmates interviewed confirmed this practice. Ten out of ten interviews with random staff confirm this practice. All 10 staff members interviewed, stated there was always at least 1 male and 1 female on duty at all times. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.15 (d) Williamson County Sheriff's Office General Order 10.6.002 outlines that inmates shall be permitted to shower, perform bodily functions and change clothing without non-medical staff of the opposite gender viewing their breasts, buttocks or genitalia. The inmates confirmed during interviews they have privacy when showering, using the toilets and while changing their clothes. Williamson County Sheriff's Office General Order 10.6.002 also requires staff of the opposite gender to announce their presence prior to entering the housing units. Even in incidents pertaining suicide cells, Williamson County does not allow opposite gender viewing. The John I. Easley Criminal Justice Center had one transgender inmate during the onsite visit; the transgender inmate stated she was allowed to come out and take a shower by herself. Inmate and staff interviews revealed that opposite gender announcements were common practice at this facility.

115.15 (e) Based Williamson County Sheriff's Office General Order 10.6.002 page 7, training curriculum (LBGT- Corrections Training) provided and staff interviews the facility prohibits staff from physically examining transgender or intersex inmates for the sole purpose of determining genital status. Staff training files showed all completed the approved training. If the inmate's genital status is unknown, it is determined during conversations with the inmate, by reviewing medical records, or, if necessary, by learning that information as part of a broader medical examination conducted in private by a medical practitioner. At the time of the site review, there was one transgender/intersex inmates to interview concerning this standard. During the past 12 months, there were no incidents where the Medical Staff had to perform an examination that fell within said parameters. The one transgender housed during the onsite visit did not have any issue with patdowns or searches. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.15 (f) Based on Williamson County Sheriff's Office General Order 10.6.002 page 6 and 7, training curriculum provided (LBGT- Corrections Training), staff training file reviews, and staff interviews the facility trains security staff to conduct cross-gender pat-down searches, and searches of transgender and intersex inmates, in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs. The John I. Easley Criminal Justice Center has housed one transgender/intersex inmate in the past twelve months. The one transgender housed during the onsite visit did not have any issue with patdowns or searches. There were also no complaints filed by the LBGTI inmate in the past 12 months related to searches. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

Standard 115.16: Inmates with disabilities and inmates who are limited English proficient

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.16 (a)

- Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who are deaf or hard of hearing? ☒ Yes ☐ No
- Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who are blind or have low vision? ☒ Yes ☐ No
- Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who have intellectual disabilities? ☒ Yes ☐ No
- Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who have psychiatric disabilities? ☒ Yes ☐ No
- Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who have speech disabilities? ☒ Yes ☐ No
- Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: Other (if "other," please explain in overall determination notes)? ☒ Yes ☐ No
- Do such steps include, when necessary, ensuring effective communication with inmates who are deaf or hard of hearing? ☒ Yes ☐ No
- Do such steps include, when necessary, providing access to interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary? ☒ Yes ☐ No
- Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with inmates with disabilities including inmates who: Have intellectual disabilities? ☒ Yes ☐ No

- Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with inmates with disabilities including inmates who: Have limited reading skills? ☒ Yes ☐ No
- Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with inmates with disabilities including inmates who: Are blind or have low vision? ☒ Yes ☐ No

115.16 (b)

- Does the agency take reasonable steps to ensure meaningful access to all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment to inmates who are limited English proficient? ☒ Yes ☐ No
- Do these steps include providing interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary? ☒ Yes ☐ No

115.16 (c)

- Does the agency always refrain from relying on inmate interpreters, inmate readers, or other types of inmate assistance except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the inmate's safety, the performance of first-response duties under §115.64, or the investigation of the inmate's allegations? ☒ Yes ☐ No

Auditor Overall Compliance Determination

- ☐ **Exceeds Standard** (*Substantially exceeds requirement of standards*)
- ☒ **Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- ☐ **Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

Evidence Reviewed:

A. Documents

1. Williamson County Sheriff's Office Pre-Audit Questionnaire/Audit Files
2. PREA Compliance Audit Instrument Checklist
3. Williamson County Sheriff's Office General Order 10.6.002 page 8
4. Language Line Documentation

- B. Interviews
 - 1. PREA Coordinator
 - 2. Random Staff

- C. Other
 - 1. TDD Phone
 - 2. Personal Observation

The following delineates the audit findings regarding this standard:

115.16 (a) Williamson County Sheriff's Office General Order 10.6.002 page 8, ensure that the John I. Easley Criminal Justice Center takes appropriate steps to ensure inmates with disabilities (including, for example, inmates who are deaf or hard of hearing, those who are blind or have low vision, or those who have intellectual, psychiatric, or speech disabilities), have an equal opportunity to participate in or benefit from all aspects of its efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including steps to provide interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary. PREA handouts, PREA postings, PREA education video, and the inmate handbook are provided. A TDD phone is available at this facility. The TDD phone was tested for functionality by the Jail Administrator. There were three inmates with mental disabilities incarcerated during the time of the audit; all displayed an understanding of the agency's zero tolerance, how to report sexual abuse and sexual harassment. The inmates and staff also confirmed that interpretive services are available when needed. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.16 (b) The John I. Easley Criminal Justice Center takes reasonable steps to ensure meaningful access to all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment to inmates who are limited English proficient, including steps to provide interpreters who can interpret effectively accurately and impartially. Language Line Services and/or staff interpreters are used to translate at this facility. The agency has utilized the Language Line multiple times in the past twelve months. There were three limited English speaking inmates and no inmates with major physical disabilities incarcerated at the time of the onsite audit. Two of the three LEP inmates remembered being screening and receiving PREA information upon intake. The third LEP inmate was given a Spanish PREA brochure and file review showed he did in fact receive a PREA screening upon intake. The staff also confirmed that interpretive services are available when needed. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.16 (c) Williamson County Sheriff's Office General Order 10.6.002 illustrates the agency does not rely on inmate interpreters, inmate readers, or other types of inmate assistants except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the inmate's safety. During the onsite visit, there were three Limited English speaking inmates incarcerated in the John I. Easley Criminal Justice Center. The PREA Coordinator advised during this audit cycle there were multiple times the Language Line Services were utilized. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

Standard 115.17: Hiring and promotion decisions

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.17 (a)

- Does the agency prohibit the hiring or promotion of anyone who may have contact with inmates who has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997)? ☒ Yes ☐ No
- Does the agency prohibit the hiring or promotion of anyone who may have contact with inmates who has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse? ☒ Yes ☐ No
- Does the agency prohibit the hiring or promotion of anyone who may have contact with inmates who has been civilly or administratively adjudicated to have engaged in the activity described in the question immediately above? ☒ Yes ☐ No
- Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997)? ☒ Yes ☐ No
- Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse? ☒ Yes ☐ No
- Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has been civilly or administratively adjudicated to have engaged in the activity described in the question immediately above? ☒ Yes ☐ No

115.17 (b)

- Does the agency consider any incidents of sexual harassment in determining whether to hire or promote anyone who may have contact with inmates? ☒ Yes ☐ No
- Does the agency consider any incidents of sexual harassment in determining whether to enlist the services of any contractor who may have contact with inmates? ☒ Yes ☐ No

115.17 (c)

- Before hiring new employees, who may have contact with inmates, does the agency perform a criminal background records check? ☒ Yes ☐ No
- Before hiring new employees who may have contact with inmates, does the agency, consistent with Federal, State, and local law, make its best efforts to contact all prior institutional employers for information on substantiated allegations of sexual abuse or any resignation during a pending investigation of an allegation of sexual abuse? ☒ Yes ☐ No

115.17 (d)

- Does the agency perform a criminal background records check before enlisting the services of any contractor who may have contact with inmates? ☒ Yes ☐ No

115.17 (e)

- Does the agency either conduct criminal background records checks at least every five years of current employees and contractors who may have contact with inmates or have in place a system for otherwise capturing such information for current employees? ☒ Yes ☐ No

115.17 (f)

- Does the agency ask all applicants and employees who may have contact with inmates directly about previous misconduct described in paragraph (a) of this section in written applications or interviews for hiring or promotions? ☒ Yes ☐ No
- Does the agency ask all applicants and employees who may have contact with inmates directly about previous misconduct described in paragraph (a) of this section in any interviews or written self-evaluations conducted as part of reviews of current employees? ☒ Yes ☐ No
- Does the agency impose upon employees a continuing affirmative duty to disclose any such misconduct? ☒ Yes ☐ No

115.17 (g)

- Does the agency consider material omissions regarding such misconduct, or the provision of materially false information, grounds for termination? ☒ Yes ☐ No

115.17 (h)

- Does the agency provide information on substantiated allegations of sexual abuse or sexual harassment involving a former employee upon receiving a request from an institutional employer for whom such employee has applied to work? (N/A if providing information on substantiated allegations of sexual abuse or sexual harassment involving a former employee is prohibited by law.) ☒ Yes ☐ No ☐ NA

Auditor Overall Compliance Determination

- ☐ **Exceeds Standard** (*Substantially exceeds requirement of standards*)
- ☒ **Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- ☐ **Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

Evidence Reviewed:

A. Documents

1. Williamson County Sheriff's Office Pre-Audit Questionnaire/Audit Files
2. PREA Compliance Audit Instrument Checklist
3. Williamson County Sheriff's Office General Order 10.6.002, page 5
4. Background Checks (10)
5. Self-Declaration Forms (10)
6. PREA Questionnaire for Prior Institutional Employers Form (1)

B. Interviews

1. Human Resource Staff
2. PREA Coordinator

The following delineates the audit findings regarding this standard:

115.17 (a) According to Williamson County Sheriff's Office General Order 10.6.002 page 5, John I. Easley Criminal Justice Center does not hire or promote anyone who may have contact with inmates, and does not enlist the services of any contractor or volunteer who may have contact with inmates, who has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution, has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse; or has been civilly or administratively adjudicated to have engaged in the activity described above. The agency ensures the completion of a PREA Self-Declaration type form on all applicants as well as a background check is completed by the Williamson County Sheriff's Office on all new applicants confirming compliance. Review of ten Human Resource files confirms this practice. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.17 (b) Williamson County Sheriff's Office General Order 10.6.002 page 5, the Williamson County Sheriff's Office considers any incidents of sexual harassment in determining whether to hire or promote anyone, or to enlist the services of any contractor or volunteer, who may have contact with inmates. Interview with the Human Resource staff confirms this practice. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.17 (c)-1 John I. Easley Criminal Justice Center requires a criminal background records check be completed before hiring any new employee. Interview with Human Resource Staff corroborates compliance. Review of ten Human Resource files also confirmed this practice. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

(c)-2 John I. Easley Criminal Justice Center makes their best efforts to contact all prior institutional employers for information on substantiated allegations of sexual abuse or any pending investigations of allegation of sexual abuse. This request is documented in the appropriate Human Resource File. The auditor reviewed one such requests. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.17 (d) According to Williamson County Sheriff's Office General Order 10.6.002 page 5, John I. Easley Criminal Justice Center requires a criminal background records check (local checks) be completed before enlisting the services of any contractor or volunteer who may have contact with the inmates. Review of two volunteer files and two contractor files confirmed compliance. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.17 (e) According to Williamson County Sheriff's Office General Order 10.6.002, John I. Easley Criminal Justice Center conducts criminal background records checks on a constant basis by utilization of NCIC's Rap Back Program of current employees and contractors who may have contact with inmates. This program alerts the Sheriff any time fingerprints are submitted for criminal charges on anyone who is a current employee, applicant, volunteer and/or contractor. The agency has not received any notifications from RAP Back in the past 12 months. Therefore, the facility exceeds compliance with this part of the standard during this audit.

115.17 (f) Williamson County Sheriff's Office General Order 10.6.002 page 6, mandates that all employees have a continuing affirmative duty to disclose any sexual misconduct as required by this standard. A "Williamson County Sheriff's Office Statement of Prior Conduct Form" is completed by all applicants, upon being hired and if being considered for a promotion. Review of Human Resource files confirms this practice. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.17 (g) Williamson County Sheriff's Office General Order 10.6.002 page 6, mandates that material omissions regarding sexual misconduct, and the provision of materially giving false information, are grounds for termination as required by this standard. During the past twelve months, there was no incident that was applicable for this section of the standard. Interview with the PREA Coordinator confirmed this practice. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.17 (h) Williamson County Sheriff's Office General Order 10.6.002 requires that the agency shall provide information on substantiated allegations of sexual abuse or sexual harassment involving a current or former employee upon receiving a request from an institutional employer for whom such employee has applied to work. During the past twelve months, there was one incident that was applicable for this section of the standard. Interview with the PREA Coordinator reiterated this process. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

Standard 115.18: Upgrades to facilities and technologies

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.18 (a)

- If the agency designed or acquired any new facility or planned any substantial expansion or modification of existing facilities, did the agency consider the effect of the design, acquisition, expansion, or modification upon the agency's ability to protect inmates from sexual abuse? (N/A if agency/facility has not acquired a new facility or made a substantial expansion to existing facilities since August 20, 2012, or since the last PREA audit, whichever is later.)
☐ Yes ☐ No ☒ NA

115.18 (b)

- If the agency installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology, did the agency consider how such technology may enhance the agency's ability to protect inmates from sexual abuse? (N/A if agency/facility has not installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology since August 20, 2012, or since the last PREA audit, whichever is later.)
☐ Yes ☐ No ☒ NA

Auditor Overall Compliance Determination

- ☐ **Exceeds Standard** (*Substantially exceeds requirement of standards*)
- ☒ **Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- ☐ **Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

Evidence Reviewed:

- A. Documents
 1. Williamson County Sheriff's Office Pre-Audit Questionnaire/Audit Files
 2. PREA Compliance Audit Instrument Checklist
- B. Interviews
 1. Sheriff
 2. Jail Administrator
- C. Other
 1. Observation during Site Review

The following delineates the audit findings regarding this standard:

115.18 (a) Williamson County Sheriff's Office General Order 10.6.002 requires when designing or acquiring any new facility and in planning any substantial expansion or modification of existing facilities, the agency shall consider the effect of the design, acquisition, expansion, or modification upon the agency's ability to protect inmates from sexual abuse. During this audit cycle there have been no significant expansions or modifications to this facility; however, the Sheriff has added several cameras in the facility to help promote sexual safety in the facility. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.18 (b) John I. Easley Criminal Justice Center requires when installing or updating a video monitoring system, electronic surveillance system, or other monitoring technology, the agency shall consider how such technology may enhance the agency's ability to protect inmates from sexual abuse. This was reaffirmed during an interview with the Jail Administrator and Sheriff. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

During this audit cycle there has been no significant additions to the video technology at this facility. Staff as well as inmates confirmed during interviews they felt safe in the facility. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

RESPONSIVE PLANNING

Standard 115.21: Evidence protocol and forensic medical examinations

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.21 (a)

- If the agency is responsible for investigating allegations of sexual abuse, does the agency follow a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)
☒ Yes ☐ No ☐ NA

115.21 (b)

- Is this protocol developmentally appropriate for youth where applicable? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.) ☒ Yes ☐ No ☐ NA
- Is this protocol, as appropriate, adapted from or otherwise based on the most recent edition of the U.S. Office of Justice's Office on Violence Against Women publication, "A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents," or similarly

comprehensive and authoritative protocols developed after 2011? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.) ☒ Yes ☐ No ☐ NA

115.21 (c)

- Does the agency offer all victims of sexual abuse access to forensic medical examinations, whether on-site or at an outside facility, without financial cost, where evidentiary or medically appropriate? ☒ Yes ☐ No
- Are such examinations performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) where possible? ☒ Yes ☐ No
- If SAFEs or SANEs cannot be made available, is the examination performed by other qualified medical practitioners (they must have been specifically trained to conduct sexual assault forensic exams)? ☒ Yes ☐ No
- Has the agency documented its efforts to provide SAFEs or SANEs? ☒ Yes ☐ No

115.21 (d)

- Does the agency attempt to make available to the victim a victim advocate from a rape crisis center? ☒ Yes ☐ No
- If a rape crisis center is not available to provide victim advocate services, does the agency make available to provide these services a qualified staff member from a community-based organization, or a qualified agency staff member? (N/A if the agency *a/ways* makes a victim advocate from a rape crisis center available to victims.) ☐ Yes ☐ No ☒ NA
- Has the agency documented its efforts to secure services from rape crisis centers? ☒ Yes ☐ No

115.21 (e)

- As requested by the victim, does the victim advocate, qualified agency staff member, or qualified community-based organization staff member accompany and support the victim through the forensic medical examination process and investigatory interviews? ☒ Yes ☐ No
- As requested by the victim, does this person provide emotional support, crisis intervention, information, and referrals? ☒ Yes ☐ No

115.21 (f)

- If the agency itself is not responsible for investigating allegations of sexual abuse, has the agency requested that the investigating agency follow the requirements of paragraphs (a) through (e) of this section? (N/A if the agency/facility is responsible for conducting criminal AND administrative sexual abuse investigations.) ☐ Yes ☐ No ☒ NA

115.21 (g)

- Auditor is not required to audit this provision.

115.21 (h)

- If the agency uses a qualified agency staff member or a qualified community-based staff member for the purposes of this section, has the individual been screened for appropriateness to serve in this role and received education concerning sexual assault and forensic examination issues in general? (N/A if agency *always* makes a victim advocate from a rape crisis center available to victims.) ☐ Yes ☐ No ☒ NA

Auditor Overall Compliance Determination

- ☐ **Exceeds Standard** (*Substantially exceeds requirement of standards*)
- ☒ **Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- ☐ **Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

Evidence Reviewed:

A. Documents

1. Williamson County Sheriff's Office Pre-Audit Questionnaire/Audit Files
2. PREA Compliance Audit Instrument Checklist
3. Williamson County Sheriff's Office General Order 10.6.002 pages 17 and 18
4. Documents supporting the attempt to enter into a Memorandum of Understanding

B. Interviews

1. PREA Coordinator
2. Medical Staff Member
3. Random Staff

The delineates the audit findings regarding this standard:

115.21 (a) and (b) John I. Easley Criminal Justice Center complies with all elements of this standard. The agency follows a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings. The Williamson County Sheriff's Office investigates all PREA complaints for potential criminal activity and maintains a close working relationship with the 21st Judicial District Prosecutor and the Williamson County Sheriff's Office Investigator on each case. Interview with the PREA Coordinator confirms this practice. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.21 (c) John I. Easley Criminal Justice Center offers all victims of sexual abuse access to forensic medical examinations at the Williamson City Medical Center without financial cost, where evidentiary or medically appropriate. Such examinations are to be performed by Sexual Assault Forensic

Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) as required. During the past 12 months, there has been one incident where this service was needed. This was confirmed during interviews with the PREA Coordinator and the Medical Staff Member. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.21 (d) The John I. Easley Criminal Justice Center has documented efforts to into a Memorandum of Understanding with Sexual Assault Center of Nashville which agrees to provide outside victim advocacies services to the inmates. The services of these victim advocates has not been requested or used by the inmates during this audit cycle. Review of the proposed MOU confirms this agreement. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.21 (e) John I. Easley Criminal Justice Center has entered to into a Memorandum of Understanding with Sexual Assault Center of Nashville which agrees to provide outside victim advocacies services to the inmates upon request. The facility also makes available to the victim a qualified agency staff member, upon request by the victim, who will accompany and support the victim through the forensic medical examination process and investigatory interviews and provide emotional support, crisis intervention, information, and referrals as warranted. During the past 12 months, there has been one incident where this service was needed. Williamson County Sheriff's Office General Order 10.6.002 page 18, and interview with the PREA Coordinator confirms this practice. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.21 (f) The Williamson County Sheriff's Office is responsible for administrative and criminal investigations with the cooperation of the 21st Judicial District Attorney General's Office covering all aspects of this standard. Interviews with random staff and the PREA Coordinator corroborate Williamson County Sheriff's Office General Order 10.6.002. Therefore, this part of the standard is not applicable to this facility.

Standard 115.22: Policies to ensure referrals of allegations for investigations

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.22 (a)

- Does the agency ensure an administrative or criminal investigation is completed for all allegations of sexual abuse? ☒ Yes ☐ No
- Does the agency ensure an administrative or criminal investigation is completed for all allegations of sexual harassment? ☒ Yes ☐ No

115.22 (b)

- Does the agency have a policy and practice in place to ensure that allegations of sexual abuse or sexual harassment are referred for investigation to an agency with the legal authority to conduct criminal investigations, unless the allegation does not involve potentially criminal behavior? ☒ Yes ☐ No
- Has the agency published such policy on its website or, if it does not have one, made the policy available through other means? ☒ Yes ☐ No
- Does the agency document all such referrals? ☒ Yes ☐ No

115.22 (c)

- If a separate entity is responsible for conducting criminal investigations, does the policy describe the responsibilities of both the agency and the investigating entity? (N/A if the agency/facility is responsible for criminal investigations. See 115.21(a).) ☐ Yes ☐ No ☒ NA

115.22 (d)

- Auditor is not required to audit this provision.

115.22 (e)

- Auditor is not required to audit this provision.

Auditor Overall Compliance Determination

- ☐ **Exceeds Standard** (*Substantially exceeds requirement of standards*)
- ☒ **Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- ☐ **Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

Evidence Reviewed:

- A. Documents
 1. Williamson County Sheriff's Office Pre-Audit Questionnaire/Audit Files
 2. PREA Compliance Audit Instrument Checklist
 3. Williamson County Sheriff's Office General Order 10.6.002
- B. Interviews
 1. PREA Coordinator
- C. Auditor Observation

The following delineates the audit findings regarding this standard:

115.22 (a) According to Williamson County Sheriff's Office General Order 10.6.002 page 17, the John I. Easley Criminal Justice Center is required to investigate ALL PREA complaints received at this facility. All potential criminal activity is referred to the PREA Investigator assigned to the John I. Easley Criminal Justice Center for the Williamson County Sheriff's Office. The PREA Coordinator confirmed, there were eleven allegations of sexual abuse referred and investigated during this audit cycle. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.22 (b) All PREA allegations are investigated by the Williamson County Sheriff's Office for potential criminal activity. If it is determined that the allegation involves potential criminal activity, it is referred to the PREA Investigator of the Williamson County Sheriff's Office for criminal investigation and prosecution as warranted. This General Order 10.6.002 is posted in the facility's lobby as required. Interview with the PREA Coordinator confirmed this practice. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.22 (c) The John I. Easley Criminal Justice Center refers all criminal allegations for investigation to the designated PREA investigator of the Williamson County Sheriff's Office. The requirements of this part of the standard are outlined in the General Order that is posted in the facility's lobby. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

TRAINING AND EDUCATION

Standard 115.31: Employee training

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.31 (a)

- Does the agency train all employees who may have contact with inmates on its zero-tolerance policy for sexual abuse and sexual harassment? ☒ Yes ☐ No
- Does the agency train all employees who may have contact with inmates on how to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures? ☒ Yes ☐ No
- Does the agency train all employees who may have contact with inmates on inmates' right to be free from sexual abuse and sexual harassment ☒ Yes ☐ No
- Does the agency train all employees who may have contact with inmates on the right of inmates and employees to be free from retaliation for reporting sexual abuse and sexual harassment? ☒ Yes ☐ No

- Does the agency train all employees who may have contact with inmates on the dynamics of sexual abuse and sexual harassment in confinement? ☒ Yes ☐ No
- Does the agency train all employees who may have contact with inmates on the common reactions of sexual abuse and sexual harassment victims? ☒ Yes ☐ No
- Does the agency train all employees who may have contact with inmates on how to detect and respond to signs of threatened and actual sexual abuse? ☒ Yes ☐ No
- Does the agency train all employees who may have contact with inmates on how to avoid inappropriate relationships with inmates? ☒ Yes ☐ No
- Does the agency train all employees who may have contact with inmates on how to communicate effectively and professionally with inmates, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming inmates? ☒ Yes ☐ No
- Does the agency train all employees who may have contact with inmates on how to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities?
☒ Yes ☐ No

115.31 (b)

- Is such training tailored to the gender of the inmates at the employee's facility? ☒ Yes ☐ No
- Have employees received additional training if reassigned from a facility that houses only male inmates to a facility that houses only female inmates, or vice versa? ☒ Yes ☐ No

115.31 (c)

- Have all current employees who may have contact with inmates received such training?
☒ Yes ☐ No
- Does the agency provide each employee with refresher training every two years to ensure that all employees know the agency's current sexual abuse and sexual harassment policies and procedures? ☒ Yes ☐ No
- In years in which an employee does not receive refresher training, does the agency provide refresher information on current sexual abuse and sexual harassment policies? ☒ Yes ☐ No

115.31 (d)

- Does the agency document, through employee signature or electronic verification, that employees understand the training they have received? ☒ Yes ☐ No

Auditor Overall Compliance Determination

- ☐ **Exceeds Standard** (*Substantially exceeds requirement of standards*)
- ☒ **Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- ☐ **Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

Evidence Reviewed:

A. Documents

1. Williamson County Sheriff's Office Pre-Audit Questionnaire/Audit Files
2. PREA Compliance Audit Instrument Checklist
3. Williamson County Sheriff's Office General Order 10.6.002, page 7
4. Employee Training Files (10)
5. Acknowledgement Training Form (10)
6. Printout of Staff Training Roster

B. Interviews

1. Random Staff

The following delineates the audit findings regarding this standard:

115.31 (a) John I. Easley Criminal Justice Center train all their employees who have contact with inmates on:

- (1) Its zero-tolerance policy for sexual abuse and sexual harassment;
- (2) How to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures;
- (3) Inmates' right to be free from sexual abuse and sexual harassment;
- (4) The right of inmates and employees to be free from retaliation for reporting sexual abuse and sexual harassment;
- (5) The dynamics of sexual abuse and sexual harassment in confinement;
- (6) The common reactions of sexual abuse and sexual harassment victims;
- (7) How to detect and respond to signs of threatened and actual sexual abuse;
- (8) How to avoid inappropriate relationships with inmates;
- (9) How to communicate effectively and professionally with inmates, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming inmates; and
- (10) How to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities.

Review of the training curriculum and training sign-in sheets confirms this process. The class consists of sixteen PowerPoint Slides; entitled "Prison Rape Elimination Act (PREA) Employee Training. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.31 (b) The training is tailored to both male and female gender of the inmates at John I. Easley Criminal Justice Center. Review of the training curriculum and training material corroborates this practice. Ten out of Ten training employee training files reviewed confirmed this practice. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.31 (c) The training staff provided a report containing all staff that had been PREA trained which confirmed the requirements needed to meet the standard and proved that all current staff was trained within one year of the effective date of the PREA standards. All staff receives annual refresher PREA training during in-service according Williamson County Sheriff's Office General Order 10.6.002 page 7, which meets the requirements of this standard. The Auditor was provided with a Staff Training printout, showing all current eligible staff had received annual refresher training. Training records are stored in the Tennessee Corrections Institute Portal. Therefore, the facility meets this part of the standard during this audit.

115.31 (d) Williamson County Sheriff's Office General Order 10.6.002 page 7, mandates that the John I. Easley Criminal Justice Center documents, through employee signature on Statement of Understanding training that all employees understand the training they have received. Training records are stored in the Tennessee Corrections Institute Portal. Ten out of Ten training files reviewed confirmed this practice. Ten out of Ten employees interviewed, stated they had received PREA training the first week of employment. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

Standard 115.32: Volunteer and contractor training

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.32 (a)

- Has the agency ensured that all volunteers and contractors who have contact with inmates have been trained on their responsibilities under the agency's sexual abuse and sexual harassment prevention, detection, and response policies and procedures? ☒ Yes ☐ No

115.32 (b)

- Have all volunteers and contractors who have contact with inmates been notified of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents (the level and type of training provided to volunteers and contractors shall be based on the services they provide and level of contact they have with inmates)? ☒ Yes ☐ No

115.32 (c)

- Does the agency maintain documentation confirming that volunteers and contractors understand the training they have received? ☒ Yes ☐ No

Auditor Overall Compliance Determination

- ☐ **Exceeds Standard** (*Substantially exceeds requirement of standards*)
- ☒ **Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- ☐ **Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

Evidence Reviewed:

A. Documents

1. Williamson County Sheriff's Office Pre-Audit Questionnaire/Audit Files
2. PREA Compliance Audit Instrument Checklist
3. Williamson County Sheriff's Office General Order 10.6.002 page 7
4. Training Files (2)
5. Acknowledgement Training Form (2)

B. Interviews

1. Volunteers and Contractors

The following delineates the audit findings regarding this standard:

115.32 (a) Williamson County Sheriff's Office General Order 10.6.002 page 7 requires John I. Easley Criminal Justice Center illustrates that all volunteers and contractors who have contact with inmates have been trained on their responsibilities under John I. Easley Criminal Justice Center's sexual abuse and sexual harassment prevention, detection, and response policies and procedures. Interview with a volunteer and contractor confirmed they received and understood PREA training. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.32 (b) The level and type of training provided to volunteers and contractors is based on the services they provide and level of contact they have with inmates, but all volunteers and contractors who have contact with inmates are notified of John I. Easley Criminal Justice Center's zero-tolerance policy regarding sexual abuse and sexual harassment and their requirements to report such incidents. Volunteers and contractors were well versed in First Responder duties. During the past 12 months, there were no volunteers or contractors who acted as First Responders to a sexual abuse incident. Review of training files and curriculum confirms this practice. Interviews with 2 volunteers and 2 contract employee confirmed this practice. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.32 (c) John I. Easley Criminal Justice Center documents through signature on the Volunteer/Contractor PREA Training Acknowledgement Form that volunteers and contractors

understand the training they have received. Review of 4 (2 contract employee and 2 volunteers) training records confirmed this practice. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

Standard 115.33: Inmate education

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.33 (a)

- During intake, do inmates receive information explaining the agency's zero-tolerance policy regarding sexual abuse and sexual harassment? ☒ Yes ☐ No
- During intake, do inmates receive information explaining how to report incidents or suspicions of sexual abuse or sexual harassment? ☒ Yes ☐ No

115.33 (b)

- Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Their rights to be free from sexual abuse and sexual harassment? ☒ Yes ☐ No
- Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Their rights to be free from retaliation for reporting such incidents? ☒ Yes ☐ No
- Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Agency policies and procedures for responding to such incidents? ☒ Yes ☐ No

115.33 (c)

- Have all inmates received the comprehensive education referenced in 115.33(b)? ☒ Yes ☐ No
- Do inmates receive education upon transfer to a different facility to the extent that the policies and procedures of the inmate's new facility differ from those of the previous facility? ☒ Yes ☐ No

115.33 (d)

- Does the agency provide inmate education in formats accessible to all inmates including those who are limited English proficient? ☒ Yes ☐ No
- Does the agency provide inmate education in formats accessible to all inmates including those who are deaf? ☒ Yes ☐ No

- Does the agency provide inmate education in formats accessible to all inmates including those who are visually impaired? ☒ Yes ☐ No
- Does the agency provide inmate education in formats accessible to all inmates including those who are otherwise disabled? ☒ Yes ☐ No
- Does the agency provide inmate education in formats accessible to all inmates including those who have limited reading skills? ☒ Yes ☐ No

115.33 (e)

- Does the agency maintain documentation of inmate participation in these education sessions? ☒ Yes ☐ No

115.33 (f)

- In addition to providing such education, does the agency ensure that key information is continuously and readily available or visible to inmates through posters, inmate handbooks, or other written formats? ☒ Yes ☐ No

Auditor Overall Compliance Determination

- ☐ **Exceeds Standard** (*Substantially exceeds requirement of standards*)
- ☒ **Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- ☐ **Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

Evidence Reviewed:

A. Documents

1. Williamson County Sheriff's Office Pre-Audit Questionnaire/Audit Files
2. PREA Compliance Audit Instrument Checklist
3. Inmate Education Form
4. Williamson County Sheriff's Office General Order 10.6.002 page 8
5. Inmate Training Records (10)
6. PREA Training Acknowledgement Forms (10)

B. Interviews

1. Intake Staff
2. Random Inmates

C. Other

1. PREA Video
2. TDD Phone
3. LEP Training Material
4. Language Line Documentation

The following delineates the audit findings regarding this standard:

115.33 (a) Williamson County Sheriff's Office General Order 10.6.002 page 8, states that during the intake process, inmates receive information explaining John I. Easley Criminal Justice Center's zero-tolerance policy regarding sexual abuse and sexual harassment and how to report incidents or suspicions of sexual abuse or sexual harassment both internally and externally. The information is on the Inmate Education form and is part of their intake packet. This process was corroborated during interviews with Intake Staff; as well as, ten out of ten random inmates. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.33 (b) Williamson County Sheriff's Office General Order 10.6.002 page 8, states that within 30 days of intake, John I. Easley Criminal Justice Center provides comprehensive education to the inmates, administered by video, regarding their rights to be free from sexual abuse and sexual harassment and to be free from retaliation for reporting such incidents, and regarding agency policies and procedures for responding to such incidents. Review of ten inmate records showed that the PREA Coordinator completes reassessments within 30 days of incarceration. Participation is properly documented. Therefore, the facility exceeds compliance with this part of the standard during this audit.

115.33 (c) During interviews with random inmates, John I. Easley Criminal Justice Center has provided such education within one year of the effective date of the PREA standards to all its inmates, Williamson County operates one facility; therefore, there are no inter-agency facility transfers. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.33 (d) John I. Easley Criminal Justice Center provides inmate education in formats accessible to all inmates, including those who are limited English proficient, deaf, visually impaired, or otherwise disabled, as well as to inmates who have limited reading skills. The facility has an agreement with Language Line Services; as well as, a TDD phones to assist inmates with these disabilities. A functionality test was successfully performed on the TDD phone by the Jail Administrator. The facility will assign staff as needed to ensure comprehension is achieved by inmates with disabilities. There were three LEP inmates housed in the John I. Easley Criminal Justice Center during the onsite visit. Two of the three LEP inmates remembered being screening and receiving PREA information upon intake. The third LEP inmate was given a Spanish PREA brochure and file review showed he did in fact receive a PREA screening upon intake. There were deaf, visually impaired, or inmates who have limited reading skills at the time of the onsite portion of the audit. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.33 (e) There was documentation provided of inmates participation in PREA educational sessions as required by this part of the standard. Interviews with ten random inmates and review of intake files confirmed this practice. Inmate stated the PREA video is played on the televisions and kiosk daily. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.33 (f) John I. Easley Criminal Justice Center does provide the inmates with posters in inmate accessible areas, pamphlets received upon intake, and an inmate handbook outlining the zero-tolerance policy regarding sexual abuse and sexual harassment and how to report incidents or suspicions of sexual abuse or sexual harassment. There were three LEP inmates housed in the John I. Easley Criminal Justice Center during the onsite visit. Two of the three LEP inmates remembered being screened and receiving PREA information upon intake. The third LEP inmate was given a Spanish PREA brochure and file review showed he did in fact receive a PREA screening upon intake. Ten out of ten inmate files reviewed showed all 10 received a PREA Handout; plus watched the PREA video. These documents are available in both English and Spanish. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

Standard 115.34: Specialized training: Investigations

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.34 (a)

- In addition to the general training provided to all employees pursuant to §115.31, does the agency ensure that, to the extent the agency itself conducts sexual abuse investigations, its investigators receive training in conducting such investigations in confinement settings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).) ☒ Yes ☐ No ☐ NA

115.34 (b)

- Does this specialized training include techniques for interviewing sexual abuse victims? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).) ☒ Yes ☐ No ☐ NA
- Does this specialized training include proper use of Miranda and Garrity warnings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).) ☒ Yes ☐ No ☐ NA
- Does this specialized training include sexual abuse evidence collection in confinement settings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).) ☒ Yes ☐ No ☐ NA
- Does this specialized training include the criteria and evidence required to substantiate a case for administrative action or prosecution referral? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).) ☒ Yes ☐ No ☐ NA

115.34 (c)

- Does the agency maintain documentation that agency investigators have completed the required specialized training in conducting sexual abuse investigations? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)
☒ Yes ☐ No ☐ NA

115.34 (d)

- Auditor is not required to audit this provision.

Auditor Overall Compliance Determination

- ☐ **Exceeds Standard** (*Substantially exceeds requirement of standards*)
- ☒ **Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- ☐ **Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

Evidence Reviewed:

A. Documents

1. Williamson County Sheriff's Office Pre-Audit Questionnaire/Audit Files
2. PREA Compliance Audit Instrument Checklist
3. Training Records
4. Williamson County Sheriff's Office General Order 10.6.000 page 20
5. PREA Training Acknowledgement Form

B. Interviews

1. Investigator

The following delineates the audit findings regarding this standard:

115.34 (a) In addition to the general PREA training provided to all employees, John I. Easley Criminal Justice Center ensures that the investigators have received training in conducting investigations in confinement settings. The PREA Investigator completed the National Institute of Corrections course on "Investigating Sexual Assaults in a Confinement Setting". Review of the PREA Investigator's training file confirmed this practice. Williamson County Sheriff's Office General Order 10.6.000 page 20 notates this practice. While reviewing the training records, the auditor did review the training document signed by the investigator, Employee PREA Training Acknowledgment Form as required in 115.31. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.34 (b) Specialized training includes techniques for interviewing sexual abuse victims, proper use of Miranda and Garrity warnings, sexual abuse evidence collection in confinement settings, and the criteria and evidence required to substantiate a case for administrative action or prosecution referral.

The PREA Investigator completed the National Institute of Corrections course on “Investigating Sexual Assaults in a Confinement Setting”. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.34 (c) John I. Easley Criminal Justice Center maintains documentation that the PREA Investigator has completed the required specialized training in conducting sexual abuse investigations. Review of the training curriculum and training file confirms compliance. The auditor found the facility PREA Investigator to be very knowledgeable in the PREA Standards pertaining to evidence collection, investigation and inmate’s rights. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

Standard 115.35: Specialized training: Medical and mental health care

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.35 (a)

- Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to detect and assess signs of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.) ☒ Yes ☐ No ☐ NA
- Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to preserve physical evidence of sexual abuse? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.) ☒ Yes ☐ No ☐ NA
- Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to respond effectively and professionally to victims of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.) ☒ Yes ☐ No ☐ NA
- Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how and to whom to report allegations or suspicions of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.) ☒ Yes ☐ No ☐ NA

115.35 (b)

- If medical staff employed by the agency conduct forensic examinations, do such medical staff receive appropriate training to conduct such examinations? (N/A if agency medical staff at the facility do not conduct forensic exams or the agency does not employ medical staff.) ☒ Yes ☐ No ☐ NA

115.35 (c)

- Does the agency maintain documentation that medical and mental health practitioners have received the training referenced in this standard either from the agency or elsewhere? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.) ☒ Yes ☐ No ☐ NA

115.35 (d)

- Do medical and mental health care practitioners employed by the agency also receive training mandated for employees by §115.31? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners employed by the agency.)
☒ Yes ☐ No ☐ NA
- Do medical and mental health care practitioners contracted by or volunteering for the agency also receive training mandated for contractors and volunteers by §115.32? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners contracted by or volunteering for the agency.) ☒ Yes ☐ No ☐ NA

Auditor Overall Compliance Determination

- ☐ **Exceeds Standard** (*Substantially exceeds requirement of standards*)
- ☒ **Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- ☐ **Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

Evidence Reviewed:

A. Documents

1. Williamson County Sheriff's Office Pre-Audit Questionnaire/Audit Files
2. PREA Compliance Audit Instrument Checklist
3. Inmate Training Records
4. PREA Training Acknowledgement Forms

B. Interviews

1. Medical Staff

The following delineates the audit findings regarding this standard:

115.35 (a) The PREA Specialized Medical/Mental curriculum provided, training file John I. Easley Criminal Justice Center review and staff interviews revealed the agency has provided specialized training to all its medical and mental health staff on how to detect and assess signs of sexual abuse and sexual harassment, how to preserve physical evidence, how to respond effectively and professionally to victims of sexual abuse and sexual harassment and how to report allegations of

sexual abuse and sexual harassment. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.35 (b) The medical staff at this facility does not conduct forensic exams. Therefore, this part of the standard is not applicable to this facility.

115.35 (c) John I. Easley Criminal Justice Center contracts with Southern Health Partners for medical and services. The agency maintains documentation that all medical and mental health practitioners have received specialized training. Specialized training consisted of the Southern Health Partners course for medical and mental health staff on dealing with sexual abuse incidents in a confinement setting. Training documentation provided confirmed this practice. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.35 (d) Medical health care practitioners with Southern Health Partners also receive the annual training mandated for all employees, contractors, and volunteers. Interview with the Medical Staff and PREA Coordinator confirmed this training. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

SCREENING FOR RISK OF SEXUAL VICTIMIZATION AND ABUSIVENESS

Standard 115.41: Screening for risk of victimization and abusiveness

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.41 (a)

- Are all inmates assessed during an intake screening for their risk of being sexually abused by other inmates or sexually abusive toward other inmates? ☒ Yes ☐ No
- Are all inmates assessed upon transfer to another facility for their risk of being sexually abused by other inmates or sexually abusive toward other inmates? ☒ Yes ☐ No

115.41 (b)

- Do intake screenings ordinarily take place within 72 hours of arrival at the facility?
☒ Yes ☐ No

115.41 (c)

- Are all PREA screening assessments conducted using an objective screening instrument?
☒ Yes ☐ No

115.41 (d)

- Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (1) Whether the inmate has a mental, physical, or developmental disability? ☒ Yes ☐ No
- Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (2) The age of the inmate? ☒ Yes ☐ No
- Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (3) The physical build of the inmate? ☒ Yes ☐ No
- Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (4) Whether the inmate has previously been incarcerated? ☒ Yes ☐ No
- Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (5) Whether the inmate's criminal history is exclusively nonviolent? ☒ Yes ☐ No
- Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (6) Whether the inmate has prior convictions for sex offenses against an adult or child? ☒ Yes ☐ No
- Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (7) Whether the inmate is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender nonconforming (the facility affirmatively asks the inmate about his/her sexual orientation and gender identity AND makes a subjective determination based on the screener's perception whether the inmate is gender non-conforming or otherwise may be perceived to be LGBTI)? ☒ Yes ☐ No
- Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (8) Whether the inmate has previously experienced sexual victimization? ☒ Yes ☐ No
- Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (9) The inmate's own perception of vulnerability? ☒ Yes ☐ No
- Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (10) Whether the inmate is detained solely for civil immigration purposes? ☒ Yes ☐ No

115.41 (e)

- In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, as known to the agency, prior acts of sexual abuse? ☒ Yes ☐ No

- In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, as known to the agency, prior convictions for violent offenses? ☒ Yes ☐ No
- In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, as known to the agency, history of prior institutional violence or sexual abuse? ☒ Yes ☐ No

115.41 (f)

- Within a set time period not more than 30 days from the inmate's arrival at the facility, does the facility reassess the inmate's risk of victimization or abusiveness based upon any additional, relevant information received by the facility since the intake screening? ☒ Yes ☐ No

115.41 (g)

- Does the facility reassess an inmate's risk level when warranted due to a referral? ☒ Yes ☐ No
- Does the facility reassess an inmate's risk level when warranted due to a request? ☒ Yes ☐ No
- Does the facility reassess an inmate's risk level when warranted due to an incident of sexual abuse? ☒ Yes ☐ No
- Does the facility reassess an inmate's risk level when warranted due to receipt of additional information that bears on the inmate's risk of sexual victimization or abusiveness? ☒ Yes ☐ No

115.41 (h)

- Is it the case that inmates are not ever disciplined for refusing to answer, or for not disclosing complete information in response to, questions asked pursuant to paragraphs (d)(1), (d)(7), (d)(8), or (d)(9) of this section? ☒ Yes ☐ No

115.41 (i)

- Has the agency implemented appropriate controls on the dissemination within the facility of responses to questions asked pursuant to this standard in order to ensure that sensitive information is not exploited to the inmate's detriment by staff or other inmates? ☒ Yes ☐ No

Auditor Overall Compliance Determination

Exceeds Standard (*Substantially exceeds requirement of standards*)

X Meets Standard (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)

Does Not Meet Standard (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

Evidence Reviewed:

A. Documents

1. Williamson County Sheriff's Office Pre-Audit Questionnaire/Audit Files
2. PREA Compliance Audit Instrument Checklist
3. Intake Files
4. Williamson County Sheriff's Office General Order 10.6.002 page 9
5. Inmate Training Records (10)
6. Reassessment Documentation (10)

B. Interviews

1. Random Inmates

The following delineates the audit findings regarding this standard:

115.41 (a) Williamson County Sheriff's Office General Order 10.6.002 page 9 states the John I. Easley Criminal Justice Center ensures that all inmates are assessed during intake and upon transfer to another facility for risk of being sexually abused by other inmates or sexually abusive toward other inmates. Williamson County Sheriff's Office only has one correctional facility; therefore, there are no inmate transfers. Interview with the PREA Coordinator confirms this practice. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.41 (b) The John I. Easley Criminal Justice Center provided documentation proving compliance with the standard that all inmates are screened for their risk of being sexually abused by other inmates or being sexually abusive toward other inmates normally upon intake but no later than 72 hours of arrival at the facility. All screening reviewed appeared to properly be completed and within the prior time frame. Ten out of ten records reviewed showed 100% compliance. Random inmate interviews corroborate this practice. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.41 (c) Based on the documentation provided and inmate file reviews the facility utilizes an objective screening instrument that covers all aspects of this standard. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.41 (d) The intake screening instrument used considers, at a minimum, the following criteria to assess inmates for risk of sexual victimization:

- (1) Whether the inmate has a mental, physical, or developmental disability;
- (2) The age of the inmate;
- (3) The physical build of the inmate;
- (4) Whether the inmate has previously been incarcerated;
- (5) Whether the inmate's criminal history is exclusively nonviolent;
- (6) Whether the inmate has prior convictions for sex offenses against an adult or child;
- (7) Whether the inmate is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender nonconforming;

- (8) Whether the inmate has previously experienced sexual victimization;
- (9) The inmate's own perception of vulnerability; and
- (10) Whether the inmate is detained solely for civil immigration purposes.

Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.41 (e) The initial screening considers prior acts of sexual abuse, prior convictions for violent offenses, and history of prior institutional violence or sexual abuse, as known to John I. Easley Criminal Justice Center, in assessing inmates for risk of being sexually abusive. Review of the screening tool confirms compliance. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.41 (f) Within 30 days from the inmate's arrival, the John I. Easley Criminal Justice Center PREA Coordinator will reassess each inmate's risk of victimization or abusiveness based upon any additional, relevant information received by John I. Easley Criminal Justice Center since the intake screening. The reassessment consists of a face-to-face interview with each inmate in a private setting by the PREA Coordinator. File review and interview with the PREA Coordinator confirms this practice. Ten out of ten inmates file review confirmed they were reassessed by the PREA Coordinator within 30 days of incarceration. Therefore, the facility meets compliance with this part of the standard during this audit.

115.41 (g) John I. Easley Criminal Justice Center will reassess an inmate's risk level when warranted due to a referral, request, incident of sexual abuse, or receipt of additional information that bears on the inmate's risk of sexual victimization or abusiveness. In the past twelve months, John I. Easley Criminal Justice Center has had one PREA incident or received any additional information that would trigger a rescreening. This practice was confirmed during an interview with the PREA Coordinator. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.41 (h) John I. Easley Criminal Justice Center does not discipline inmates for refusing to answer screening questions or not disclosing complete information. Interviews with the PREA Coordinator and ten random inmates confirmed compliance. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.41 (i) John I. Easley Criminal Justice Center implements appropriate controls on the dissemination of responses to questions asked pursuant to this standard in order to ensure that sensitive information is not exploited to the inmate's detriment by staff or other inmates. Screenings are considered confidential and forwarded to Medical and the PREA Coordinator for review. Based on policy review, interview with the PREA Coordinator, and interviews with the staff responsible for completing the screening, all information gathered on the screening instrument is restricted to staff making housing, work and program assignments. Screening documents are secured in the inmate's medical file. Reassessments are secured in the PREA Coordinators Office. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

Standard 115.42: Use of screening information

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.42 (a)

- Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Housing Assignments? ☒ Yes ☐ No
- Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Bed assignments? ☒ Yes ☐ No
- Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Work Assignments? ☒ Yes ☐ No
- Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Education Assignments? ☒ Yes ☐ No
- Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Program Assignments? ☒ Yes ☐ No

115.42 (b)

- Does the agency make individualized determinations about how to ensure the safety of each inmate? ☒ Yes ☐ No

115.42 (c)

- When deciding whether to assign a transgender or intersex inmate to a facility for male or female inmates, does the agency consider, on a case-by-case basis whether a placement would ensure the inmate's health and safety, and whether a placement would present management or security problems (NOTE: if an agency by policy or practice assigns inmates to a male or female facility on the basis of anatomy alone, that agency is not in compliance with this standard)? ☒ Yes ☐ No
- When making housing or other program assignments for transgender or intersex inmates, does the agency consider on a case-by-case basis whether a placement would ensure the inmate's health and safety, and whether a placement would present management or security problems? ☒ Yes ☐ No

115.42 (d)

- Are placement and programming assignments for each transgender or intersex inmate reassessed at least twice each year to review any threats to safety experienced by the inmate? ☒ Yes ☐ No

115.42 (e)

- Are each transgender or intersex inmate's own views with respect to his or her own safety given serious consideration when making facility and housing placement decisions and programming assignments? ☒ Yes ☐ No

115.42 (f)

- Are transgender and intersex inmates given the opportunity to shower separately from other inmates? ☒ Yes ☐ No

115.42 (g)

- Unless placement is in a dedicated facility, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting lesbian, gay, bisexual, transgender, or intersex inmates, does the agency always refrain from placing: lesbian, gay, and bisexual inmates in dedicated facilities, units, or wings solely on the basis of such identification or status? (N/A if the agency has a dedicated facility, unit, or wing solely for the placement of LGBT or I inmates pursuant to a consent decree, legal settlement, or legal judgment.) ☒ Yes ☐ No ☐ NA
- Unless placement is in a dedicated facility, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting lesbian, gay, bisexual, transgender, or intersex inmates, does the agency always refrain from placing: transgender inmates in dedicated facilities, units, or wings solely on the basis of such identification or status? (N/A if the agency has a dedicated facility, unit, or wing solely for the placement of LGBT or I inmates pursuant to a consent decree, legal settlement, or legal judgment.) ☒ Yes ☐ No ☐ NA
- Unless placement is in a dedicated facility, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting lesbian, gay, bisexual, transgender, or intersex inmates, does the agency always refrain from placing: intersex inmates in dedicated facilities, units, or wings solely on the basis of such identification or status? (N/A if the agency has a dedicated facility, unit, or wing solely for the placement of LGBT or I inmates pursuant to a consent decree, legal settlement, or legal judgment.) ☐ Yes ☒ No ☐ NA

Auditor Overall Compliance Determination

- ☐ **Exceeds Standard** (*Substantially exceeds requirement of standards*)
- ☒ **Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- ☐ **Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

Evidence Reviewed:

A. Documents

1. Williamson County Sheriff's Office Pre-Audit Questionnaire/Audit Files
2. PREA Compliance Audit Instrument Checklist
3. Williamson County Sheriff's Office General Order 10.6.002 page 10
4. Transgender Housing Documentation

B. Interviews

1. Screening Staff
2. PREA Coordinator

The following delineates the audit findings regarding this standard:

115.42 (a) Williamson County Sheriff's Office General Order 10.6.002 page 10, details John I. Easley Criminal Justice Center's uses information from the risk screening to decide housing, bed, work, education, and program assignments with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive. During the site review, the auditor randomly reviewed housing and programming for screened inmates; all housing and programming reviewed were found appropriate. The PREA Coordinator reviews all initial PREA assessments and has the authority to override the results when warranted. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.42 (b) John I. Easley Criminal Justice Center makes individualized determinations about how to ensure the safety of each inmate. This was corroborated during an interview with the PREA Coordinator. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.42 (c) John I. Easley Criminal Justice Center outlines the procedures to be followed in deciding whether to assign a transgender inmate to a facility for male or female inmates, and the process for making housing and programming assignments, on case by case basis as required by this standard. At the time of the audit, John I. Easley Criminal Justice Center did have one transgender inmate. Based on interview with the LGBTI inmate housed at this facility the inmate confirmed feeling safe at the facility and felt staff considered the inmate's safety when making housing and programming assignments. A PREA Housing and Programs Review Form, is completed for all transgender inmates by members of the Sexual Assault Response Team. SART is made up of members of the Sheriff, Medical, PREA Coordinator and Jail Administrator. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.42 (d) John I. Easley Criminal Justice Center outlines the procedures for placement and programming assignments of each transgender or intersex inmate being reassessed at least twice per year to review any threats to safety experienced by the inmate as required by this standard. John I. Easley Criminal Justice Center page 10 and interview with the PREA Coordinator confirmed this procedure. There were no transgender or intersex inmates housed in the facility for the past twelve months. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.42 (e) John I. Easley Criminal Justice Center requires that a transgender and intersex inmate's own views regarding their own safety be given serious consideration. There were one transgender/intersex inmates housed in the facility for the past twelve months. Based on interview with the LGBTI inmate housed at this facility the inmate confirmed feeling safe at the facility and felt staff considered the inmate's safety when making housing and programming assignments. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.42 (f) John I. Easley Criminal Justice Center requires that transgender and intersex inmates be given the opportunity to shower separately from other inmates. There was one transgender inmates housed in the facility during the onsite visit. The transgender inmates was allowed to come out and shower alone; this practice was documented in the appropriate log book. Showers at this facility are covered which allows all inmates privacy. The decision for housing and programs placement for a transgender inmate is documented. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.42 (g) John I. Easley Criminal Justice Center does not place lesbian, gay, bisexual, transgender, or intersex inmates in dedicated facilities, units, or wings solely on the basis of such identification or status, unless such placement is in a dedicated facility, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting such inmates. The auditor's observation during the site review corroborated this procedure; inmates were not found to be placed in any particular housing unit in the facility based on LGBTI related information. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

Standard 115.43: Protective Custody

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.43 (a)

- Does the facility always refrain from placing inmates at high risk for sexual victimization in involuntary segregated housing unless an assessment of all available alternatives has been made, and a determination has been made that there is no available alternative means of separation from likely abusers? ☒ Yes ☐ No
- If a facility cannot conduct such an assessment immediately, does the facility hold the inmate in involuntary segregated housing for less than 24 hours while completing the assessment? ☒ Yes ☐ No

115.43 (b)

- Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Programs to the extent possible? ☒ Yes ☐ No

- Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Privileges to the extent possible? ☒ Yes ☐ No
- Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Education to the extent possible? ☒ Yes ☐ No
- Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Work opportunities to the extent possible? ☒ Yes ☐ No
- If the facility restricts any access to programs, privileges, education, or work opportunities, does the facility document the opportunities that have been limited? (N/A if the facility *never* restricts access to programs, privileges, education, or work opportunities.) ☐ Yes ☐ No ☒ NA
- If the facility restricts any access to programs, privileges, education, or work opportunities, does the facility document the duration of the limitation? (N/A if the facility *never* restricts access to programs, privileges, education, or work opportunities.) ☐ Yes ☐ No ☒ NA
- If the facility restricts any access to programs, privileges, education, or work opportunities, does the facility document the reasons for such limitations? (N/A if the facility *never* restricts access to programs, privileges, education, or work opportunities.) ☐ Yes ☐ No ☒ NA

115.43 (c)

- Does the facility assign inmates at high risk of sexual victimization to involuntary segregated housing only until an alternative means of separation from likely abusers can be arranged? ☒ Yes ☐ No
- Does such an assignment not ordinarily exceed a period of 30 days? ☒ Yes ☐ No

115.43 (d)

- If an involuntary segregated housing assignment is made pursuant to paragraph (a) of this section, does the facility clearly document the basis for the facility's concern for the inmate's safety? ☒ Yes ☐ No
- If an involuntary segregated housing assignment is made pursuant to paragraph (a) of this section, does the facility clearly document the reason why no alternative means of separation can be arranged? ☒ Yes ☐ No

115.43 (e)

- In the case of each inmate who is placed in involuntary segregation because he/she is at high risk of sexual victimization, does the facility afford a review to determine whether there is a continuing need for separation from the general population EVERY 30 DAYS? ☒ Yes ☐ No

Auditor Overall Compliance Determination

☐ **Exceeds Standard** (*Substantially exceeds requirement of standards*)

- ☒ **Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- ☐ **Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

Evidence Reviewed:

A. Documents

1. Williamson County Sheriff's Office Pre-Audit Questionnaire/Audit Files
2. PREA Compliance Audit Instrument Checklist
3. Williamson County Sheriff's Office General Order 10.6.002 page 10

B. Interviews

1. Jail Administrator
2. Segregated Housing Staff

The following delineates the audit findings regarding this standard:

115.43 (a) Inmates at high risk for sexual victimization are not placed in involuntary segregated housing unless an assessment of all available alternatives has been made, and a determination has been made that there is no available alternative means of separation from likely abusers. The Williamson County Sheriff's Office General Order 10.6.002 page 10, outlines the procedures to ensure compliance with this standard. Staff and inmate interviews revealed several incidents of involuntary segregated for up to 24 hours; inmates were assessed and promptly moved. The auditor's interview with the PREA Coordinator confirmed this practice. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.43 (b) Inmates placed in segregated housing for this purpose have access to programs, privileges, education, and work opportunities to the extent possible. If John I. Easley Criminal Justice Center restricts access to programs, privileges, education, or work opportunities, John I. Easley Criminal Justice Center documents the opportunities that have been limited, the duration of the limitation; and the reasons for such limitations. Staff and inmate interviews revealed no incidents of involuntary segregated housing being used for more than 24 hours for this purpose during the past 12 months at this facility; therefore there were no 30-day reviews. Jail Administrator and Segregated Housing Staff interviews revealed no incidents of involuntary segregated housing being used for this purpose during the past 12 months at this facility. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.43 (c) Williamson County Sheriff's Office General Order 10.6.002 page 10, details the John I. Easley Criminal Justice Center assigns such inmates to involuntary segregated housing only until an alternative means of separation from likely abusers can be arranged, and such an assignment does not ordinarily exceed a period of 30 days. Staff and inmate interviews revealed no incidents of involuntary segregated housing for more than 24 hours being used for this purpose during the past

12 months at this facility; therefore there were no 30-day reviews. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

REPORTING

Standard 115.51: Inmate reporting

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.51 (a)

- Does the agency provide multiple internal ways for inmates to privately report sexual abuse and sexual harassment? ☒ Yes ☐ No
- Does the agency provide multiple internal ways for inmates to privately report retaliation by other inmates or staff for reporting sexual abuse and sexual harassment? ☒ Yes ☐ No
- Does the agency provide multiple internal ways for inmates to privately report staff neglect or violation of responsibilities that may have contributed to such incidents? ☒ Yes ☐ No

115.51 (b)

- Does the agency also provide at least one way for inmates to report sexual abuse or sexual harassment to a public or private entity or office that is not part of the agency? ☒ Yes ☐ No
- Is that private entity or office able to receive and immediately forward inmate reports of sexual abuse and sexual harassment to agency officials? ☒ Yes ☐ No
- Does that private entity or office allow the inmate to remain anonymous upon request?
☒ Yes ☐ No
- Are inmates detained solely for civil immigration purposes provided information on how to contact relevant consular officials and relevant officials at the Office of Homeland Security? (N/A if the facility *never* houses inmates detained solely for civil immigration purposes) ☒ Yes ☐ No ☐ NA

115.51 (c)

- Does staff accept reports of sexual abuse and sexual harassment made verbally, in writing, anonymously, and from third parties? ☒ Yes ☐ No
- Does staff promptly document any verbal reports of sexual abuse and sexual harassment?
☒ Yes ☐ No

115.51 (d)

- Does the agency provide a method for staff to privately report sexual abuse and sexual harassment of inmates? ☒ Yes ☐ No

Auditor Overall Compliance Determination

- ☐ **Exceeds Standard** (*Substantially exceeds requirement of standards*)
- ☒ **Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- ☐ **Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

Evidence Reviewed:

- A. Documents
1. Williamson County Sheriff's Office Pre-Audit Questionnaire/Audit Files
 2. PREA Compliance Audit Instrument Checklist
 3. Williamson County Sheriff's Office General Order 10.6.002 page 11
- B. Interviews
1. PREA Coordinator
 2. Random Staff
 3. Random Inmates
- C. Other
1. Posters/Handouts
 2. Observation During Site Review

The following delineates the audit findings regarding this standard:

115.51 (a) Williamson County Sheriff's Office General Order 10.6.002 pages 11 and 12, state the John I. Easley Criminal Justice Center provides multiple internal ways for inmates to report incidents of abuse or harassment. They can report verbally, in writing, dialing the hotline provided and/or through report of a third party. An internal hotline will notify multiple members of the SART team. Interviews with random staff and inmates corroborate this process. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.51 (b) Williamson County Sheriff's Office General Order 10.6.002 pages 11 and 12, states the John I. Easley Criminal Justice Center provides at least one way for inmates to report abuse or harassment to a public or private entity or Office that is not part of John I. Easley Criminal Justice Center, and that is able to receive and immediately forward inmate reports of sexual abuse and sexual harassment to agency officials, allowing the inmate to remain anonymous upon request. The external hotline number is answered by the Brentwood Police Department Dispatch, satisfying the requirements of this standard. The external reporting hotline was tested during the site review.

During the past 12 months, John I. Easley Criminal Justice Center has not housed an inmate solely for immigration status; provision would be made for the detainee to contact his/her consular. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.51 (c) Williamson County Sheriff's Office General Order 10.6.002 pages 11 and 12 requires all staff to accept reports made verbally, in writing, anonymously and from third parties. During the past 12 months, no reports were made anonymously and one report was made by a third party. All allegations shall be promptly documented in an incident report and reported to the supervisor. Interviews with Random Staff confirmed this practice. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.51 (d) John I. Easley Criminal Justice Center staff may privately report sexual abuse and sexual harassment to the Jail Administrator, a supervisor, PREA Coordinator, or the PREA external telephone number. Interviews with Random Staff confirmed this practice. During the past 12 months, no reports were made anonymously and one by a third party. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

Standard 115.52: Exhaustion of administrative remedies

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.52 (a)

- Is the agency exempt from this standard? NOTE: The agency is exempt ONLY if it does not have administrative procedures to address inmate grievances regarding sexual abuse. This does not mean the agency is exempt simply because an inmate does not have to or is not ordinarily expected to submit a grievance to report sexual abuse. This means that as a matter of explicit policy, the agency does not have an administrative remedies process to address sexual abuse. ☐ Yes ☒ No

115.52 (b)

- Does the agency permit inmates to submit a grievance regarding an allegation of sexual abuse without any type of time limits? (The agency may apply otherwise-applicable time limits to any portion of a grievance that does not allege an incident of sexual abuse.) (N/A if agency is exempt from this standard.) ☒ Yes ☐ No ☐ NA
- Does the agency always refrain from requiring an inmate to use any informal grievance process, or to otherwise attempt to resolve with staff, an alleged incident of sexual abuse? (N/A if agency is exempt from this standard.) ☒ Yes ☐ No ☐ NA

115.52 (c)

- Does the agency ensure that: An inmate who alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint? (N/A if agency is exempt from this standard.) ☒ Yes ☐ No ☐ NA

- Does the agency ensure that: Such grievance is not referred to a staff member who is the subject of the complaint? (N/A if agency is exempt from this standard.) ☒ Yes ☐ No ☐ NA

115.52 (d)

- Does the agency issue a final agency decision on the merits of any portion of a grievance alleging sexual abuse within 90 days of the initial filing of the grievance? (Computation of the 90-day time period does not include time consumed by inmates in preparing any administrative appeal.) (N/A if agency is exempt from this standard.) ☒ Yes ☐ No ☐ NA
- If the agency claims the maximum allowable extension of time to respond of up to 70 days per 115.52(d)(3) when the normal time period for response is insufficient to make an appropriate decision, does the agency notify the inmate in writing of any such extension and provide a date by which a decision will be made? (N/A if agency is exempt from this standard.) ☒ Yes ☐ No ☐ NA
- At any level of the administrative process, including the final level, if the inmate does not receive a response within the time allotted for reply, including any properly noticed extension, may an inmate consider the absence of a response to be a denial at that level? (N/A if agency is exempt from this standard.) ☒ Yes ☐ No ☐ NA

115.52 (e)

- Are third parties, including fellow inmates, staff members, family members, attorneys, and outside advocates, permitted to assist inmates in filing requests for administrative remedies relating to allegations of sexual abuse? (N/A if agency is exempt from this standard.) ☒ Yes ☐ No ☐ NA
- Are those third parties also permitted to file such requests on behalf of inmates? (If a third-party files such a request on behalf of an inmate, the facility may require as a condition of processing the request that the alleged victim agree to have the request filed on his or her behalf, and may also require the alleged victim to personally pursue any subsequent steps in the administrative remedy process.) (N/A if agency is exempt from this standard.) ☒ Yes ☐ No ☐ NA
- If the inmate declines to have the request processed on his or her behalf, does the agency document the inmate's decision? (N/A if agency is exempt from this standard.) ☒ Yes ☐ No ☐ NA

115.52 (f)

- Has the agency established procedures for the filing of an emergency grievance alleging that an inmate is subject to a substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.) ☒ Yes ☐ No ☐ NA
- After receiving an emergency grievance alleging an inmate is subject to a substantial risk of imminent sexual abuse, does the agency immediately forward the grievance (or any portion thereof that alleges the substantial risk of imminent sexual abuse) to a level of review at which immediate corrective action may be taken? (N/A if agency is exempt from this standard.) ☒ Yes ☐ No ☐ NA

- After receiving an emergency grievance described above, does the agency provide an initial response within 48 hours? (N/A if agency is exempt from this standard.) ☒ Yes ☐ No ☐ NA
- After receiving an emergency grievance described above, does the agency issue a final agency decision within 5 calendar days? (N/A if agency is exempt from this standard.) ☒ Yes ☐ No ☐ NA
- Does the initial response and final agency decision document the agency's determination whether the inmate is in substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.) ☒ Yes ☐ No ☐ NA
- Does the initial response document the agency's action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.) ☒ Yes ☐ No ☐ NA
- Does the agency's final decision document the agency's action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.) ☒ Yes ☐ No ☐ NA

115.52 (g)

- If the agency disciplines an inmate for filing a grievance related to alleged sexual abuse, does it do so ONLY where the agency demonstrates that the inmate filed the grievance in bad faith? (N/A if agency is exempt from this standard.) ☒ Yes ☐ No ☐ NA

Auditor Overall Compliance Determination

- ☐ **Exceeds Standard** (*Substantially exceeds requirement of standards*)
- ☒ **Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- ☐ **Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

Evidence Reviewed:

A. Documents

1. Williamson County Sheriff's Office Pre-Audit Questionnaire/Audit Files
2. PREA Compliance Audit Instrument Checklist
3. Williamson County Sheriff's Office General Order 10.6.002 pages 11 and 12

B. Interviews

1. PREA Coordinator
2. Random Staff
3. Random Inmates

115.52 (a) According to Williamson County Sheriff's Office General Order 10.6.002 page 11, the agency investigates any report of sexual abuse and takes appropriate actions whether or not such information is received in the form of a grievance. During the past 12 months, John I. Easley Criminal Justice Center has been one grievance concerning sexual abuse. Interview with the PREA Coordinator confirms this process. The agency is in compliance with this section of the standard.

115.52 (b) The Williamson County Sheriff's Office does not impose a time limit on when an offenders/detainees may submit a grievance regarding an allegation of sexual abuse. Interview with the PREA Coordinator confirms this practice. Therefore, the agency complies with this section of the standard.

115.52 (c) Williamson County Sheriff's Office General Order 10.6.002 page 12, states the agency will ensure that an offenders/detainees alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint. During the past 12 months, John I. Easley Criminal Justice Center has been one grievance concerning sexual abuse. Additionally, such grievances will not be referred to the staff member who is the subject of the complaint. Therefore, the agency is in compliance.

115.52 (d) According to Williamson County Sheriff's Office General Order 10.6.002 page 12, the agency will investigate the matter and render a determination within 90 days. An extension of up to 70 days to issue a determination may be taken if the facts and circumstances require, and the complainant is notified in writing of the extension and the date that a determination will be made. At any level of the administrative process, including the final level, if the complainant does not receive a response within the time allotted for reply, including any properly noticed extension, the offenders/detainees complainant may consider the absence of a response to be a denial at this level. During the past 12 months, John I. Easley Criminal Justice Center has been one grievance concerning sexual abuse. Interview with the PREA Coordinator reiterates this process; therefore the agency is found to be in compliance with section of the standard.

115.52 (e) Williamson County Sheriff's Office General Order 10.6.002 page 12, states third parties including fellow offenders/detainees, staff members, family members, attorneys and outside advocates, shall be permitted to assist offenders/detainees in filing requests for administrative remedies related to allegations of sexual abuse and shall also be permitted to file such requests on behalf of offenders/detainees. If the offenders/detainees declines to have the request processed on his or her behalf, the agency shall document the offenders/detainees' decision. During the past 12 months, John I. Easley Criminal Justice Center has been one grievance concerning sexual abuse. The PREA Coordinator confirmed this process. Therefore, the agency complies with this section of the standard.

115.52 (f) The Williamson County Sheriff's Office General Order 10.6.002 states when an offenders/detainees is subject to a substantial risk of imminent threat of sexual abuse, the offenders/detainees may file a grievance through the grievance process on the kiosk system and the grievance will be considered an emergency grievance. The initial response to the grievance must be made within 48 hours and the final determination must be made within 5 calendar days, except in circumstances of county holidays and significant events. The agency's immediate focus must be to take action to prevent the potential sexual abuse. Corrective and protective action must be pursued promptly. Williamson County Sheriff's Office General Order 10.6.002 page 12 mandates that staff

must treat the information as confidential, only to be revealed to their supervisors in the chain-of-command to ensure prompt action is taken. During the past 12 months, John I. Easley Criminal Justice Center has had one grievance concerning sexual abuse. Interview with the PREA Coordinator confirms this practice; therefore the agency complies with this standard.

Standard 115.53: Inmate access to outside confidential support services

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.53 (a)

- Does the facility provide inmates with access to outside victim advocates for emotional support services related to sexual abuse by giving inmates mailing addresses and telephone numbers, including toll-free hotline numbers where available, of local, State, or national victim advocacy or rape crisis organizations? ☒ Yes ☐ No
- Does the facility provide persons detained solely for civil immigration purposes mailing addresses and telephone numbers, including toll-free hotline numbers where available of local, State, or national immigrant services agencies? (N/A if the facility *never* has persons detained solely for civil immigration purposes.) ☒ Yes ☐ No ☐ NA
- Does the facility enable reasonable communication between inmates and these organizations and agencies, in as confidential a manner as possible? ☒ Yes ☐ No

115.53 (b)

- Does the facility inform inmates, prior to giving them access, of the extent to which such communications will be monitored and the extent to which reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws? ☒ Yes ☐ No

115.53 (c)

- Does the agency maintain or attempt to enter into memoranda of understanding or other agreements with community service providers that are able to provide inmates with confidential emotional support services related to sexual abuse? ☒ Yes ☐ No
- Does the agency maintain copies of agreements or documentation showing attempts to enter into such agreements? ☒ Yes ☐ No

Auditor Overall Compliance Determination

- ☐ **Exceeds Standard** (*Substantially exceeds requirement of standards*)
- ☒ **Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- ☐ **Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

Evidence Reviewed:

A. Documents

1. Williamson County Sheriff's Office Pre-Audit Questionnaire/Audit Files
2. PREA Compliance Audit Instrument Checklist
3. Williamson County Sheriff's Office General Order 10.6.002 PREA page 11
4. Memorandum of Understanding

B. Interviews

1. PREA Coordinator
2. Random Staff
3. Random Inmates

The following delineates the audit findings regarding this standard:

115.53 (a) The Williamson County Sheriff's Office General Order 10.6.002 page 11 details the agency's commitment to compliance. The agency has entered into a Memorandum of Understanding with Sexual Assault Center of Nashville which has agrees and is currently providing confidential outside victim advocacies services to the inmates at Williamson County Jail. The mailing address and telephone number for this agency are made available to all inmates at the facility. John I. Easley Criminal Justice Center enables reasonable communication between inmates and these organizations and agencies, in as confidential a manner as possible. Williamson County does not house inmates solely for immigration purposes. Immigration (ICE) does place holds on inmates with local charges; once the local charge(s) is released – Immigration has 48 hours to pick up the detainee. The services of these victim advocates have not been requested or used by the inmates during this audit cycle, verified by phone call. The auditor observed "Speak Up" posters throughout the facility; the posters not only had reporting procedures but included a summation of Victim Support Services with contact numbers and address. Information is also listed on the "Speak Up" brochure that each inmate receives during the intake process. At the time of the onsite visit, John I. Easley Criminal Justice Center did not have any detainees housed for immigration. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.53 (b) John I. Easley Criminal Justice Center informs inmates, prior to giving them access, of the extent to which such communications will be monitored and the extent to which reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws. The Jail Administrator confirmed, all calls to Brentwood Police Department Dispatch are free and not recorded. The auditor

did test the phone system while onsite. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.53 (c) Williamson County Sheriff's Office utilizes the Brentwood Police Department Dispatch for external reporting; the agency currently provides emotional support services to victims of sexual abuse. There were eleven reported incidents of sexual abuse in the past 12 months. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

Standard 115.54: Third-party reporting

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.54 (a)

- Has the agency established a method to receive third-party reports of sexual abuse and sexual harassment? ☒ Yes ☐ No
- Has the agency distributed publicly information on how to report sexual abuse and sexual harassment on behalf of an inmate? ☒ Yes ☐ No

Auditor Overall Compliance Determination

- ☐ **Exceeds Standard** (*Substantially exceeds requirement of standards*)
- ☒ **Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- ☐ **Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

Evidence Reviewed:

- A. Documents
 1. Williamson County Sheriff's Office Pre-Audit Questionnaire/Audit Files
 2. PREA Compliance Audit Instrument Checklist
 3. Williamson County Sheriff's Office General Order 10.6.002 PREA page 11
 4. Agency Website
- B. Interviews
 1. PREA Coordinator
- C. Other
 1. Auditor Observation

115.54 (a) The Williamson County Sheriff's Office General Order 10.6.002 page 11, details the agency's commitment to compliance. The agency provides multiple methods for receiving third-party reports of sexual abuse and sexual harassment; to include, call Sexual Assault Center of Nashville, and tell friends and family members who may call the jail or mail a letter to report sexual abuse. Third Party Reporting procedures are posted in the lobby of the jail. Inmates are advised of third party reporting on "Speak Up" posters that are throughout the facility. The information available in the lobby explains how to report sexual abuse and sexual harassment on behalf of an inmate. The facility takes all reports seriously no matter how they are received and investigates each reported incident. During the past 12 months, Williamson County has received one third party reports of sexual abuse. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

OFFICIAL RESPONSE FOLLOWING AN INMATE REPORT

Standard 115.61: Staff and agency reporting duties

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.61 (a)

- Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of the agency? ☒ Yes ☐ No
- Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding retaliation against inmates or staff who reported an incident of sexual abuse or sexual harassment? ☒ Yes ☐ No
- Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding any staff neglect or violation of responsibilities that may have contributed to an incident of sexual abuse or sexual harassment or retaliation? ☒ Yes ☐ No

115.61 (b)

- Apart from reporting to designated supervisors or officials, does staff always refrain from revealing any information related to a sexual abuse report to anyone other than to the extent necessary, as specified in agency policy, to make treatment, investigation, and other security and management decisions? ☒ Yes ☐ No

115.61 (c)

- Unless otherwise precluded by Federal, State, or local law, are medical and mental health practitioners required to report sexual abuse pursuant to paragraph (a) of this section? ☒ Yes ☐ No

- Are medical and mental health practitioners required to inform inmates of the practitioner's duty to report, and the limitations of confidentiality, at the initiation of services? ☒ Yes ☐ No

115.61 (d)

- If the alleged victim is under the age of 18 or considered a vulnerable adult under a State or local vulnerable persons statute, does the agency report the allegation to the designated State or local services agency under applicable mandatory reporting laws? ☒ Yes ☐ No

115.61 (e)

- Does the facility report all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to the facility's designated investigators? ☒ Yes ☐ No

Auditor Overall Compliance Determination

- ☐ **Exceeds Standard** (*Substantially exceeds requirement of standards*)
- ☒ **Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- ☐ **Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

Evidence Reviewed:

A. Documents

1. Williamson County Sheriff's Office Pre-Audit Questionnaire/Audit Files
2. PREA Compliance Audit Instrument Checklist
3. Williamson County Sheriff's Office General Order 10.6.002 PREA page 18

B. Interviews

1. PREA Coordinator
2. Random Staff

The following delineates the audit findings regarding this standard:

115.61 (a) The Williamson County Sheriff's Office General Order 10.6.002 page 18 requires all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of Williamson County Jail; retaliation against inmates or staff who reported such an incident; and any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.61 (b) John I. Easley Criminal Justice Center requires apart from reporting to designated supervisors or officials, staff do not reveal any information related to a sexual abuse report to anyone other than to the extent necessary, as specified in agency General Order, to make treatment, investigation, and other security and management decisions. Interviews with random staff confirmed that staff had received and understood their reporting responsibilities. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.61 (c) John I. Easley Criminal Justice Center requires medical and mental health practitioners to report sexual abuse immediately to the security staff supervisor. Medical and mental health practitioners are required to inform the inmates of their duty to report, and the limitations of confidentiality, at the initiation of services. During the past 12 months there has not been an incident requiring medical nor mental health practitioners to complete this procedure. This was confirmed during interviews with Sexual Assault Center of Nashville Services staff and with the contracted Medical Staff Member. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.61 (d) If the alleged victim is under the age of 18 or considered a vulnerable adult under a State or local vulnerable persons statute, John I. Easley Criminal Justice Center reports the allegation to the designated state or local services agency. During interviews with both the Jail Administrator and PREA Coordinator, each understood that the Office of Children Services would need to be contacted if the alleged victim was under the age of 18. During the past 12 months, John I. Easley Criminal Justice Center has not housed anyone under the age of 18 or anyone considered a vulnerable adult. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.61 (e) John I. Easley Criminal Justice Center reports all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to the PREA Investigator as required. During the past 12 months, John I. Easley Criminal Justice Center has not received an anonymous or third party report of sexual abuse. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

Standard 115.62: Agency protection duties

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.62 (a)

- When the agency learns that an inmate is subject to a substantial risk of imminent sexual abuse, does it take immediate action to protect the inmate? ☒ Yes ☐ No

Auditor Overall Compliance Determination

- ☐ **Exceeds Standard** (*Substantially exceeds requirement of standards*)
- ☒ **Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- ☐ **Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

Evidence Reviewed:

A. Documents

1. Williamson County Sheriff's Office Pre-Audit Questionnaire/Audit Files
2. PREA Compliance Audit Instrument Checklist
3. Williamson County Sheriff's Office General Order 10.6.002 PREA

B. Interviews

1. Jail Administrator
2. Random Staff

The following delineates the audit findings regarding this standard:

115.62 (a) The Williamson County Sheriff's Office General Order 10.6.002 page 4 details the agency's commitment to compliance. Policy and staff training requires all staff to take immediate action and staff acknowledged during their interviews the requirement of all staff to protect inmates when it is learned that an inmate at the John I. Easley Criminal Justice Center is subject to a substantial risk of imminent sexual abuse. Interviews with the Jail Administrator and ten out of ten Random Staff corroborated this practice. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

Standard 115.63: Reporting to other confinement facilities

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.63 (a)

- Upon receiving an allegation that an inmate was sexually abused while confined at another facility, does the head of the facility that received the allegation notify the head of the facility or appropriate office of the agency where the alleged abuse occurred? ☒ Yes ☐ No

115.63 (b)

- Is such notification provided as soon as possible, but no later than 72 hours after receiving the allegation? ☒ Yes ☐ No

115.63 (c)

- Does the agency document that it has provided such notification? ☒ Yes ☐ No

115.63 (d)

- Does the facility head or agency office that receives such notification ensure that the allegation is investigated in accordance with these standards? ☒ Yes ☐ No

Auditor Overall Compliance Determination

- ☐ **Exceeds Standard** (*Substantially exceeds requirement of standards*)
- ☒ **Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- ☐ **Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

Evidence Reviewed:

A. Documents

1. Williamson County Sheriff's Office Pre-Audit Questionnaire/Audit Files
2. PREA Compliance Audit Instrument Checklist
3. Williamson County Sheriff's General Order 10.6.002 PREA
4. Notification Form

B. Interviews

1. PREA Investigator

The following delineates the audit findings regarding this standard:

115.63 (a) The Williamson County Sheriff's Office General Order 10.6.002 page 13 details the agency's commitment to compliance. Upon receiving an allegation that an inmate was sexually abused while confined at another facility, the head of John I. Easley Criminal Justice Center that received the allegation notifies the head of the facility or appropriate Office where the alleged abuse occurred. This process is documented the agency's memorandum form Williamson County Sheriff's Office Notification of Alleged Abuse. During the past 12 months, Williamson County has made one notification to another agency pertaining to sexual abuse. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.63 (b) and (c) Such notification is provided as soon as possible, but no later than 72 hours after receiving the allegation, and all actions are thoroughly documented by the PREA Investigator. During the past 12 months, Williamson County has made one notification to another agency pertaining to sexual abuse. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.63 (d) Upon receiving a call from an outside facility that an inmate had been sexually abused while in the custody of the Williamson County Jail. During the past 12 months, Williamson County has not received a notification to another agency pertaining to sexual abuse. If received, the allegation is referred immediately to the PREA Investigator to be investigated. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

Standard 115.64: Staff first responder duties

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.64 (a)

- Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Separate the alleged victim and abuser?
☒ Yes ☐ No
- Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence? ☒ Yes ☐ No
- Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Request that the alleged victim not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence? ☒ Yes ☐ No
- Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Ensure that the alleged abuser does not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence? ☒ Yes ☐ No

115.64 (b)

- If the first staff responder is not a security staff member, is the responder required to request that the alleged victim not take any actions that could destroy physical evidence, and then notify security staff? ☒ Yes ☐ No

Auditor Overall Compliance Determination

- ☐ **Exceeds Standard** (*Substantially exceeds requirement of standards*)
- ☒ **Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- ☐ **Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

Evidence Reviewed:

A. Documents

1. Williamson County Sheriff's Office Pre-Audit Questionnaire/Audit Files
2. PREA Compliance Audit Instrument Checklist
3. Williamson County Sheriff's Office General Order 10.6.002 PREA page 18
4. First Responder Card

B. Interviews

1. PREA Coordinator
2. Random Staff

The following delineates the audit findings regarding this standard:

115.64 (a) Williamson County Sheriff's Office General Order 10.6.002 page 18 details the agency's commitment to compliance; the policy outlines the responsibilities of all staff members receiving an allegation of sexual abuse to follow these guidelines:

- (1) Separate the alleged victim and abuser;
- (2) Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence;
- (3) If the abuse occurred within a time period that still allows for the collection of physical evidence, request that the alleged victim not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating; and
- (4) If the abuse occurred within a time period that still allows for the collection of physical evidence, ensure that the alleged abuser does not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

Each employee is required to keep a First Responder Card on their person at all times.

115.64 (b) Williamson County Sheriff's Office General Order 10.6.002 page 18 mandates when the first staff responder is not a security staff member, they shall advise the alleged victim not to take any actions that could destroy physical evidence, and then notify security staff immediately. The auditor confirmed compliance based on interviews with random staff and training records of non-security staff. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

Standard 115.65: Coordinated response

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.65 (a)

- Has the facility developed a written institutional plan to coordinate actions among staff first responders, medical and mental health practitioners, investigators, and facility leadership taken in response to an incident of sexual abuse? ☒ Yes ☐ No

Auditor Overall Compliance Determination

- ☐ **Exceeds Standard** (*Substantially exceeds requirement of standards*)
- ☒ **Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- ☐ **Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

Evidence Reviewed:

- A. Documents
 1. Williamson County Sheriff's Office Pre-Audit Questionnaire/Audit Files
 2. PREA Compliance Audit Instrument Checklist
- B. Interviews
 1. PREA Coordinator
 2. Shift Supervisor
 3. SART Members

The following delineates the audit findings regarding this standard:

115.65 (a) John I. Easley Criminal Justice Center has a comprehensive written plan to coordinate actions taken in response to an incident of sexual abuse, among staff first responders, medical and mental health practitioners, investigators and facility leadership. The plan clearly defines the roles and responsibilities of each person involved and the procedures to be followed in detail. Roles addressed include the First Responder, Shift Supervisor, PREA Coordinator and the PREA investigator. Interviews with SART members and shift supervisors on each shift confirmed their knowledge of the response plan.

Standard 115.66: Preservation of ability to protect inmates from contact with abusers

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.66 (a)

- Are both the agency and any other governmental entities responsible for collective bargaining on the agency's behalf prohibited from entering into or renewing any collective bargaining agreement or other agreement that limits the agency's ability to remove alleged staff sexual abusers from contact with any inmates pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted? ☒ Yes ☐ No

115.66 (b)

- Auditor is not required to audit this provision.

Auditor Overall Compliance Determination

- ☐ **Exceeds Standard** (*Substantially exceeds requirement of standards*)
- ☒ **Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- ☐ **Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

Evidence Reviewed:

- A. Documents
 1. Williamson County Sheriff's Office Pre-Audit Questionnaire/Audit Files
 2. PREA Compliance Audit Instrument Checklist
- B. Interviews
 1. PREA Coordinator
 2. Jail Administrator

The following delineates the audit findings regarding this standard:

115.66 (a) Employees are subject to disciplinary sanctions up to termination for violating Williamson County Sheriff's Office General Order 10.6.002 on sexual abuse and sexual harassment. The PREA Coordinator and Jail Administrator confirmed that the Williamson County Sheriff's Office has not entered into any collective bargaining agreements during this audit cycle. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

Standard 115.67: Agency protection against retaliation

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.67 (a)

- Has the agency established a policy to protect all inmates and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other inmates or staff? ☒ Yes ☐ No
- Has the agency designated which staff members or Offices are charged with monitoring retaliation? ☒ Yes ☐ No

115.67 (b)

- Does the agency employ multiple protection measures, such as housing changes or transfers for inmate victims or abusers, removal of alleged staff or inmate abusers from contact with victims, and emotional support services, for inmates or staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations? ☒ Yes ☐ No

115.67 (c)

- Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of inmates or staff who reported the sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff? ☒ Yes ☐ No
- Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of inmates who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff? ☒ Yes ☐ No
- Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Act promptly to remedy any such retaliation? ☒ Yes ☐ No
- Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor any inmate disciplinary reports? ☒ Yes ☐ No
- Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor inmate housing changes? ☒ Yes ☐ No
- Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor inmate program changes? ☒ Yes ☐ No

- Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor negative performance reviews of staff? ☒ Yes ☐ No
- Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor reassignments of staff? ☒ Yes ☐ No
- Does the agency continue such monitoring beyond 90 days if the initial monitoring indicates a continuing need? ☒ Yes ☐ No

115.67 (d)

- In the case of inmates, does such monitoring also include periodic status checks?
☒ Yes ☐ No

115.67 (e)

- If any other individual who cooperates with an investigation expresses a fear of retaliation, does the agency take appropriate measures to protect that individual against retaliation?
☒ Yes ☐ No

115.67 (f)

- Auditor is not required to audit this provision.

Auditor Overall Compliance Determination

- ☐ **Exceeds Standard** (*Substantially exceeds requirement of standards*)
- ☒ **Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- ☐ **Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

Evidence Reviewed:

A. Documents

1. Williamson County Sheriff's Office Pre-Audit Questionnaire/Audit Files
2. PREA Compliance Audit Instrument Checklist
3. Williamson County Sheriff's Office General Order 10.6.002 PREA pages 19 and 20
4. Retaliation Form

B. Interviews

1. PREA Coordinator

The following delineates the audit findings regarding this standard:

115.67 (a) The Williamson County Sheriff's Office General Order 10.6.002 page 19 details the agency's commitment to compliance. John I. Easley Criminal Justice Center has a policy to protect all inmates and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other inmates or staff, and designates which staff members or Offices are charged with monitoring retaliation. John I. Easley Criminal Justice Center has a retaliation form for inmates who report sexual abuse and a separate form for staff who report sexual abuse. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.67 (b) John I. Easley Criminal Justice Center has multiple protection measures, such as housing changes or transfers for inmates, victims or abusers, removal of alleged staff or inmate abusers from contact with victims, and emotional support services for inmates or staff that fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations. The Inmate Retaliation Form has detailed information for all relevant notifications; if needed John I. Easley Criminal Justice Center has had one substantiated, one unsubstantiated, and one pending PREA finding of sexual abuse; retaliation monitoring was completed for each allegation. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.67 (c) The Williamson County Sheriff's Office General Order 10.6.002 page 20, states for at least 90 days following a report of sexual abuse, John I. Easley Criminal Justice Center monitors the conduct and treatment of inmates or staff who reported the sexual abuse and of inmates who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff, and act promptly to remedy any such retaliation. There is periodic status checks performed and documented. John I. Easley Criminal Justice Center monitoring includes any inmate disciplinary reports, housing, or program changes, or negative performance reviews or reassignments of staff. Such monitoring continues beyond 90 days if the initial monitoring indicates a continuing need. The Retaliation Form has detailed information for all relevant notifications; if needed. John I. Easley Criminal Justice Center has had one substantiated, one unsubstantiated, and one pending PREA finding of sexual abuse; retaliation monitoring was completed for each allegation. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.67 (d) If any other individual who cooperates with an investigation expresses a fear of retaliation, John I. Easley Criminal Justice Center takes appropriate measures to protect that individual against retaliation. The Retaliation Form has detailed information for all relevant notifications; if needed. John I. Easley Criminal Justice Center has had one substantiated, one unsubstantiated, and one pending PREA finding of sexual abuse; retaliation monitoring was completed for each allegation. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

Standard 115.68: Post-allegation protective custody

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.68 (a)

- Is any and all use of segregated housing to protect an inmate who is alleged to have suffered sexual abuse subject to the requirements of § 115.43? ☒ Yes ☐ No

Auditor Overall Compliance Determination

- ☐ **Exceeds Standard** (*Substantially exceeds requirement of standards*)
- ☒ **Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- ☐ **Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

Evidence Reviewed:

- A. Documents
1. Williamson County Sheriff's Office Pre-Audit Questionnaire/Audit Files
 2. PREA Compliance Audit Instrument Checklist
 3. Williamson County Sheriff's Office General Order 10.6.002 page 20
- B. Interviews
1. PREA Coordinator
 2. Random Inmate Interviews
 3. Segregation Staff Interviews

The following delineates the audit findings regarding this standard:

115.68 (a) The Williamson County Sheriff's Office General Order 10.6.002 page 20, PREA details the agency's commitment to compliance with this standard. John I. Easley Criminal Justice Center prohibits offenders who have alleged sexual abuse to be placed in involuntary segregated housing. Interviews with the facility administration and segregation staff revealed that involuntary segregation has not been used for this purpose in the past 12 months; therefore, there were not any subsequent monitoring documentation. The PREA Coordinator stated that if separation was required to protect the offender, they would be placed in segregation for no longer than 72 hours. This was confirmed during random inmates and segregation officer interviews. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

INVESTIGATIONS

Standard 115.71: Criminal and administrative agency investigations

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.71 (a)

- When the agency conducts its own investigations into allegations of sexual abuse and sexual harassment, does it do so promptly, thoroughly, and objectively? [N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations. See 115.21(a).] ☒ Yes ☐ No ☐ NA
- Does the agency conduct such investigations for all allegations, including third party and anonymous reports? [N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations. See 115.21(a).] ☒ Yes ☐ No ☐ NA

115.71 (b)

- Where sexual abuse is alleged, does the agency use investigators who have received specialized training in sexual abuse investigations as required by 115.34? ☒ Yes ☐ No

115.71 (c)

- Do investigators gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data? ☒ Yes ☐ No
- Do investigators interview alleged victims, suspected perpetrators, and witnesses?
☒ Yes ☐ No
- Do investigators review prior reports and complaints of sexual abuse involving the suspected perpetrator? ☒ Yes ☐ No

115.71 (d)

- When the quality of evidence appears to support criminal prosecution, does the agency conduct compelled interviews only after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal prosecution? ☒ Yes ☐ No

115.71 (e)

- Do agency investigators assess the credibility of an alleged victim, suspect, or witness on an individual basis and not on the basis of that individual's status as inmate or staff? ☒ Yes ☐ No
- Does the agency investigate allegations of sexual abuse without requiring an inmate who alleges sexual abuse to submit to a polygraph examination or other truth-telling device as a condition for proceeding? ☒ Yes ☐ No

115.71 (f)

- Do administrative investigations include an effort to determine whether staff actions or failures to act contributed to the abuse? ☒ Yes ☐ No
- Are administrative investigations documented in written reports that include a description of the physical evidence and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings? ☒ Yes ☐ No

115.71 (g)

- Are criminal investigations documented in a written report that contains a thorough description of the physical, testimonial, and documentary evidence and attaches copies of all documentary evidence where feasible? ☒ Yes ☐ No

115.71 (h)

- Are all substantiated allegations of conduct that appears to be criminal referred for prosecution? ☒ Yes ☐ No

115.71 (i)

- Does the agency retain all written reports referenced in 115.71(f) and (g) for as long as the alleged abuser is incarcerated or employed by the agency, plus five years? ☒ Yes ☐ No

115.71 (j)

- Does the agency ensure that the departure of an alleged abuser or victim from the employment or control of the agency does not provide a basis for terminating an investigation? ☐ Yes ☐ No

115.71 (k)

- Auditor is not required to audit this provision.

115.71 (l)

- When an outside entity investigates sexual abuse, does the facility cooperate with outside investigators and endeavor to remain informed about the progress of the investigation? (N/A if an outside agency does not conduct administrative or criminal sexual abuse investigations. See 115.21(a).) ☐ Yes ☐ No ☒ NA

Auditor Overall Compliance Determination

- ☐ **Exceeds Standard** (*Substantially exceeds requirement of standards*)
- ☒ **Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- ☐ **Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

Evidence Reviewed:

A. Documents

1. Williamson County Sheriff's Office Pre-Audit Questionnaire/Audit Files
2. PREA Compliance Audit Instrument Checklist
3. Williamson County Sheriff's Office General Order 10.6.002 PREA pages 21-23
4. Investigation File

B. Interviews

1. PREA Coordinator
2. Investigator

The following delineates the audit findings regarding this standard:

115.71 (a) The Williamson County Sheriff's Office General Order 10.6.002 PREA page 20 details the agency's commitment to compliance. John I. Easley Criminal Justice Center PREA Investigator conducts an investigation immediately when notified of an allegation of sexual abuse and sexual harassment. There were forty five PREA incidents reported in the past twelve months; therefore, there were two investigative files to review. Policy does mandate:

- i. An effort to determine whether staff actions or failures to act contributed to the abuse;
- ii. Investigations shall be documented in written reports that include a description of the physical and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings.

Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.71 (b) Based on training curriculums provided, investigators training file review, and investigative staff interviews, it was evident the facility provided, in addition to the general training received by all employees, specialized training to all its investigators. This training included techniques for interviewing sexual abuse victims, proper use of Miranda and Garrity warnings, sexual abuse evidence collection in confinement settings and the criteria and evidence required to substantiate a case for administrative action or prosecution referral. In the past 12 months, John I.

Easley Criminal Justice Center had forty five PREA investigations. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.71 (c) Williamson County Sheriff's Office General Order 10.6.002 PREA pages 22 states that John I. Easley Criminal Justice Center PREA Investigators gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data; takes photos of the alleged crime scene, reviews incident and shift reports, interview alleged victims, suspected perpetrators, and witnesses; and review prior complaints and reports of sexual abuse involving the suspected perpetrator. In the past 12 months, John I. Easley Criminal Justice Center has had forty five total PREA investigations. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.71 (d) When the quality of evidence appears to support criminal prosecution, John I. Easley Criminal Justice Center refers the case to the 21st Judicial District Attorney General's Office for prosecution. In the past 12 months, John I. Easley Criminal Justice Center has referred two PREA investigations for referral; one staff and one inmate. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.71 (e) The credibility of an alleged victim, suspect, or witness is assessed on an individual basis and is not determined by the person's status as inmate or staff. The inmate who alleges sexual abuse is not required to submit to a polygraph examination or other truth-telling device as a condition for proceeding with the investigation of such an allegation. In the past 12 months, John I. Easley Criminal Justice Center had forty five PREA investigations; two were referred to the 21st Judicial District Attorney General's Office. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.71 (f) John I. Easley Criminal Justice Center administrative investigations include efforts to determine whether staff actions or failures to act contributed to the abuse; and are documented in written reports that include a description of the physical and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings. In the past 12 months, John I. Easley Criminal Justice Center has thirty four PREA investigations for sexual harassment and eleven for sexual abuse. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.71 (g) John I. Easley Criminal Justice Center criminal investigations are documented by the Williamson County Sheriff's Office PREA Investigator in a written report that contains a thorough description of physical, testimonial, and documentary evidence and attaches copies of all documentary evidence where feasible. In the past 12 months, John I. Easley Criminal Justice Center had forty five PREA investigations for sexual harassment and sexual harassment. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.71 (h) J Williamson County Sheriff's Office General Order 10.6.002 PREA pages 22, states the John I. Easley Criminal Justice Center refers all allegations to the Williamson County Sheriff's Office PREA Investigator for investigation and prosecution when warranted. In the past 12 months, John I. Easley Criminal Justice Center had eleven PREA abuse investigations: therefore, there were eleven investigation file for sexual harassment to review. Two investigations were referred to the 21st Judicial District Attorney's General's Office for prosecution; the third was determined to be unsubstantiated and the rest were deemed unfounded. The alleged Staff perpetrator was

terminated. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.71 (i) John I. Easley Criminal Justice Center retains all written reports for as long as the alleged abuser is incarcerated or employed by John I. Easley Criminal Justice Center, plus five years. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.71 (j) Williamson County Sheriff’s Office General Order 10.6.002 PREA pages 23 states that the departure of the alleged abuser or victim from employment or control of the John I. Easley Criminal Justice Center or agency does not provide a basis for terminating an investigation. In the past 12 months, John I. Easley Criminal Justice Center had three PREA abuse investigations: therefore, there were two sexual harassment files to review. Two investigations were reviewed for prosecution; one was determined to be unsubstantiated and the rest were deemed unfounded. One alleged perpetrator was terminated from employment; the second is an inmate pending Grand Jury indictment. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.71 (k) The Williamson County Sheriff’s Office PREA Investigator conducts criminal sexual abuse investigations pursuant to the requirements of this standard. The Williamson County Sheriff’s Office General Order 10.6.001 PREA page 20 outlines the requirements of the criminal investigation and complies with all aspects of this standard. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.71 (l) John I. Easley Criminal Justice Center refers all criminal cases to the Williamson County Sheriff’s Office PREA Investigator. By policy, the facility remains informed of the progress of the investigation through communication between the Attorney General’s Office and the Williamson County Sheriff’s Office PREA Investigator agent handling the case. In the past 12 months, John I. Easley Criminal Justice Center had two investigations referred for prosecution; both are still ongoing. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

Breakdown of the PREA investigations in the past 12 months

SOI	Abuse/Misconduct	Substantiated	1
		Unsubstantiated	1
		Unfounded	6
	Harassment	Substantiated	0
		Unsubstantiated	2
		Unfounded	5
IOI	Abuse/Misconduct	Substantiated	0
		Unsubstantiated	0

	Unfounded	2
	Pending	1
Harassment	Substantiated	1
	Unsubstantiated	18
	Unfounded	8

Standard 115.72: Evidentiary standard for administrative investigations

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.72 (a)

- Is it true that the agency does not impose a standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated? ☒ Yes ☐ No

Auditor Overall Compliance Determination

- ☐ **Exceeds Standard** (*Substantially exceeds requirement of standards*)
- ☒ **Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- ☐ **Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

Evidence Reviewed:

- A. Documents
 1. Williamson County Sheriff's Office Pre-Audit Questionnaire/Audit Files
 2. PREA Compliance Audit Instrument Checklist
 3. Investigation File
- B. Interviews
 1. PREA Coordinator
 2. PREA Investigator
 3. Random Inmates

The following delineates the audit findings regarding this standard:

John I. Easley Criminal Justice Center imposes no standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated. All PREA allegations begin as potential criminal investigations; if no criminality occurred, the allegation will then be treated as a potential administrative investigation. In the past 12 months, John I. Easley

Criminal Justice Center had forty five PREA investigations: two cases were referred for prosecution. Interview with the PREA Investigator corroborated this practice. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

Breakdown of the PREA investigations in the past 12 months

SOI	Abuse/Misconduct	Substantiated	1
		Unsubstantiated	1
		Unfounded	6
	Harassment	Substantiated	0
		Unsubstantiated	2
		Unfounded	5
IOI	Abuse/Misconduct	Substantiated	0
		Unsubstantiated	0
		Unfounded	2
		Pending	1
	Harassment	Substantiated	1
		Unsubstantiated	18
		Unfounded	8

Standard 115.73: Reporting to inmates

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.73 (a)

- Following an investigation into an inmate's allegation that he or she suffered sexual abuse in an agency facility, does the agency inform the inmate as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded? ☒ Yes ☐ No

115.73 (b)

- If the agency did not conduct the investigation into an inmate's allegation of sexual abuse in an agency facility, does the agency request the relevant information from the investigative agency in order to inform the inmate? (N/A if the agency/facility is responsible for conducting administrative and criminal investigations.) ☐ Yes ☐ No ☒ NA

115.73 (c)

- Following an inmate's allegation that a staff member has committed sexual abuse against the inmate, unless the agency has determined that the allegation is unfounded, or unless the inmate has been released from custody, does the agency subsequently inform the inmate whenever: The staff member is no longer posted within the inmate's unit? ☒ Yes ☐ No
- Following an inmate's allegation that a staff member has committed sexual abuse against the inmate, unless the agency has determined that the allegation is unfounded, or unless the inmate has been released from custody, does the agency subsequently inform the inmate whenever: The staff member is no longer employed at the facility? ☒ Yes ☐ No
- Following an inmate's allegation that a staff member has committed sexual abuse against the inmate, unless the agency has determined that the allegation is unfounded, or unless the inmate has been released from custody, does the agency subsequently inform the inmate whenever: The agency learns that the staff member has been indicted on a charge related to sexual abuse in the facility? ☒ Yes ☐ No
- Following an inmate's allegation that a staff member has committed sexual abuse against the inmate, unless the agency has determined that the allegation is unfounded, or unless the inmate has been released from custody, does the agency subsequently inform the inmate whenever: The agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility? ☒ Yes ☐ No

115.73 (d)

- Following an inmate's allegation that he or she has been sexually abused by another inmate, does the agency subsequently inform the alleged victim whenever: The agency learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility? ☒ Yes ☐ No
- Following an inmate's allegation that he or she has been sexually abused by another inmate, does the agency subsequently inform the alleged victim whenever: The agency learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility? ☒ Yes ☐ No

115.73 (e)

- Does the agency document all such notifications or attempted notifications? ☒ Yes ☐ No

115.73 (f)

- Auditor is not required to audit this provision.

Auditor Overall Compliance Determination

- ☐ **Exceeds Standard** (*Substantially exceeds requirement of standards*)
- ☒ **Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- ☐ **Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

Evidence Reviewed:

A. Documents

1. Williamson County Sheriff's Office Pre-Audit Questionnaire/Audit Files
2. PREA Compliance Audit Instrument Checklist
3. Williamson County Sheriff's Office General Order 10.6.002 PREA page 22
4. Notification Form

B. Interviews

1. PREA Coordinator

The following delineates the audit findings regarding this standard:

115.73 (a) The Williamson County Sheriff's Office General Order 10.6.002 PREA page 22 details the agency's commitment to compliance. Based on Williamson County's General Order it was confirmed that following an investigation into an inmate's allegation he/she suffered sexual abuse in the facility, the inmate was to be informed whether the allegation had been determined to be substantiated, unsubstantiated, or unfounded. The documentation provided confirmed the inmates would be provided this notification. In the past 12 months, John I. Easley Criminal Justice Center has had forty five investigations: therefore, forty five notifications have been made. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.73 (b) The agency conducts its own PREA investigations. Therefore, the facility is exempt with this part of the standard during this audit.

115.73 (c) Based on John I. Easley Criminal Justice Center practice and documentation provided, it was confirmed that following an inmate's allegation that a staff member has committed sexual abuse against the inmate, the agency shall subsequently inform the inmate (unless the agency has determined that the allegation is unfounded) whenever:

- (1) The staff member is no longer posted within the inmate's unit;
- (2) The staff member is no longer employed at the facility;
- (3) The agency learns that the staff member has been indicted on a charge related to sexual abuse within the John I. Easley Criminal Justice Center ; or
- (4) The agency learns that the staff member has been convicted on a charge related to sexual abuse within the John I. Easley Criminal Justice Center.

The documentation provided confirmed the inmates would be provided this notification. This was confirmed during file review, inmate interviews, and an interview with the PREA Coordinator who makes the notification. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.73 (d) Following an inmate’s allegation they had been sexually abused by another inmate, John I. Easley Criminal Justice Center subsequently informs the alleged victim whenever the facility learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility; or John I. Easley Criminal Justice Center learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility. The documentation provided confirmed the inmates would be provided this notification. In the past 12 months, John I. Easley Criminal Justice Center has had forty five PREA investigations: records review revealed all victims were properly notified. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.73 (e) All such notifications or attempted notifications are completed by the PREA Coordinator and is documented in the appropriate PREA investigation file. In the past 12 months, John I. Easley Criminal Justice Center has had forty five PREA investigations; all victims were properly notified. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.73 (f) Williamson County Sheriff’s Office General Order 10.6.002 PREA page 22, outlines the agency’s obligation to report under this standard terminates if the inmate is released from John I. Easley Criminal Justice Center’s custody. In the past 12 months, John I. Easley Criminal Justice Center has had forty five PREA investigations; all victims were properly notified. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

DISCIPLINE

Standard 115.76: Disciplinary sanctions for staff

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.76 (a)

- Are staff subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies? ☒ Yes ☐ No

115.76 (b)

- Is termination the presumptive disciplinary sanction for staff who have engaged in sexual abuse? ☒ Yes ☐ No

115.76 (c)

- Are disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) commensurate with the nature and circumstances of the acts committed, the staff member's disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar histories? ☒ Yes ☐ No

115.76 (d)

- Are all terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, reported to: Law enforcement agencies (unless the activity was clearly not criminal)? ☒ Yes ☐ No
- Are all terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, reported to: Relevant licensing bodies? ☒ Yes ☐ No

Auditor Overall Compliance Determination

- ☐ **Exceeds Standard** (*Substantially exceeds requirement of standards*)
- ☒ **Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- ☐ **Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

Evidence Reviewed:

- A. Documents
1. Williamson County Sheriff's Office Pre-Audit Questionnaire/Audit Files
 2. PREA Compliance Audit Instrument Checklist
 3. Williamson County Sheriff's Office General Order 10.6.002 PREA page 14
- B. Interviews
2. PREA Coordinator

The following delineates the audit findings regarding this standard:

115.76 The Williamson County Sheriff's Office General Order 10.6.002 PREA page 14 details the agency's commitment to compliance.

(a) and (b) Staff are subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies. Termination is the presumptive disciplinary sanction for staff who have engaged in sexual abuse. There was one staff member terminated for PREA violations within the past 12 months. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.76 (c) Disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) are commensurate with the nature and circumstances of the acts committed, the staff member's disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar histories. There was one staff member terminated for PREA violations within the past 12 months. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.76 (d) All terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, are reported to law enforcement, unless the activity was clearly not criminal, and to any relevant licensing bodies. There was one employee terminated and indicted for PREA violations within the past 12 months. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

Standard 115.77: Corrective action for contractors and volunteers

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.77 (a)

- Is any contractor or volunteer who engages in sexual abuse prohibited from contact with inmates? ☒ Yes ☐ No
- Is any contractor or volunteer who engages in sexual abuse reported to: Law enforcement agencies (unless the activity was clearly not criminal)? ☒ Yes ☐ No
- Is any contractor or volunteer who engages in sexual abuse reported to: Relevant licensing bodies? ☒ Yes ☐ No

115.77 (b)

- In the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer, does the facility take appropriate remedial measures, and consider whether to prohibit further contact with inmates? ☒ Yes ☐ No

Auditor Overall Compliance Determination

- ☐ **Exceeds Standard** (*Substantially exceeds requirement of standards*)
- ☒ **Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- ☐ **Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

Evidence Reviewed:

A. Documents

1. Williamson County Sheriff's Office Pre-Audit Questionnaire/Audit Files
2. PREA Compliance Audit Instrument Checklist
3. Williamson County Sheriff's Office General Order 10.6.002 PREA page 15

B. Interviews

3. PREA Coordinator

The following delineates the audit findings regarding this standard:

115.77 (a) The Williamson County Sheriff's Office General Order 10.6.002 PREA page 15 details the agency's commitment to compliance. Any contractor or volunteer who engages in sexual abuse is prohibited from contact with inmates and are reported to law enforcement, unless the activity was clearly not criminal, and to relevant licensing bodies. During the past 12 months, there were no contractors or volunteers who were perpetrators in a substantiated PREA investigation. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.77 (b) John I. Easley Criminal Justice Center takes appropriate remedial measures, and considers whether to prohibit further contact with inmates, in the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer. During the past 12 months, there were no contractors or volunteers who were perpetrators in a substantiated PREA investigation. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

Standard 115.78: Disciplinary sanctions for inmates

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.78 (a)

- Following an administrative finding that an inmate engaged in inmate-on-inmate sexual abuse, or following a criminal finding of guilt for inmate-on-inmate sexual abuse, are inmates subject to disciplinary sanctions pursuant to a formal disciplinary process? ☒ Yes ☐ No

115.78 (b)

- Are sanctions commensurate with the nature and circumstances of the abuse committed, the inmate's disciplinary history, and the sanctions imposed for comparable offenses by other inmates with similar histories? ☒ Yes ☐ No

115.78 (c)

- When determining what types of sanction, if any, should be imposed, does the disciplinary process consider whether an inmate's mental disabilities or mental illness contributed to his or her behavior? ☒ Yes ☐ No

115.78 (d)

- If the facility offers therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for the abuse, does the facility consider whether to require the offending inmate to participate in such interventions as a condition of access to programming and other benefits? ☒ Yes ☐ No

115.78 (e)

- Does the agency discipline an inmate for sexual contact with staff only upon a finding that the staff member did not consent to such contact? ☒ Yes ☐ No

115.78 (f)

- For the purpose of disciplinary action does a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred NOT constitute falsely reporting an incident or lying, even if an investigation does not establish evidence sufficient to substantiate the allegation? ☒ Yes ☐ No

115.78 (g)

- If the agency prohibits all sexual activity between inmates, does the agency always refrain from considering non-coercive sexual activity between inmates to be sexual abuse? (N/A if the agency does not prohibit all sexual activity between inmates.) ☒ Yes ☐ No ☐ NA

Auditor Overall Compliance Determination

- ☐ **Exceeds Standard** (*Substantially exceeds requirement of standards*)
- ☒ **Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- ☐ **Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

Evidence Reviewed:

A. Documents

1. Williamson County Sheriff's Office Pre-Audit Questionnaire/Audit Files
2. PREA Compliance Audit Instrument Checklist
3. Williamson County Sheriff's Office General Order 10.6.002 PREA pages 14 and 15

B. Interviews

1. PREA Coordinator

The following delineates the audit findings regarding this standard:

115.78 (a) The Williamson County Sheriff's Office General Order 10.6.002 page 14, details the agency's commitment to compliance. Inmates are subject to disciplinary sanctions pursuant to a formal disciplinary process following an administrative finding that the inmate engaged in inmate-on-inmate sexual abuse or following a criminal finding of guilt for inmate-on-inmate sexual abuse. During the past twelve months, there have not been any PREA investigations. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.78 (b) Sanctions are commensurate with the nature and circumstances of the abuse committed, the inmate's disciplinary history, and the sanctions imposed for comparable offenses by other inmates with similar histories. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.78 (c) The disciplinary processes considers whether an inmate's mental disabilities or mental illness contributed to his or her behavior when determining what type of sanction, if any, should be imposed. This would be done, when needed, by the contracted Mental Health Services Provider. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.78 (d) Sexual Assault Center of Nashville staff offers therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for the abuse, John I. Easley Criminal Justice Center does not require the offending inmate to participate in such interventions as a condition of access to programming or other benefits. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.78 (e) John I. Easley Criminal Justice Center disciplines an inmate for sexual contact with staff only upon a finding that the staff member did not consent to such contact. This was confirmed during an interview with the PREA Coordinator. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.78 (f) Williamson County Sheriff's Office General Order 10.6.002 PREA pages 15 states a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred does not constitute falsely reporting an incident or lying, even if an investigation does not establish evidence sufficient to substantiate the allegation. During the past twelve months, there has not been such an incident. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.78 (f) John I. Easley Criminal Justice Center prohibits all sexual activity between inmates and may discipline inmates for such activity. This was confirmed during an interview with the PREA Coordinator. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

MEDICAL AND MENTAL CARE

Standard 115.81: Medical and mental health screenings; history of sexual abuse

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.81 (a)

- If the screening pursuant to § 115.41 indicates that a prison inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a prison.)
☐ Yes ☐ No ☒ NA

115.81 (b)

- If the screening pursuant to § 115.41 indicates that a prison inmate has previously perpetrated sexual abuse, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a prison.) ☐ Yes ☐ No ☒ NA

115.81 (c)

- If the screening pursuant to § 115.41 indicates that a jail inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening? ☒ Yes ☐ No

115.81 (d)

- Is any information related to sexual victimization or abusiveness that occurred in an institutional setting strictly limited to medical and mental health practitioners and other staff as necessary to inform treatment plans and security management decisions, including housing, bed, work, education, and program assignments, or as otherwise required by Federal, State, or local law?
☒ Yes ☐ No

115.81 (e)

- Do medical and mental health practitioners obtain informed consent from inmates before reporting information about prior sexual victimization that did not occur in an institutional setting, unless the inmate is under the age of 18? ☒ Yes ☐ No

Auditor Overall Compliance Determination

- ☐ **Exceeds Standard** (*Substantially exceeds requirement of standards*)
- ☒ **Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- ☐ **Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

Evidence Reviewed:

A. Documents

1. Williamson County Sheriff's Office Pre-Audit Questionnaire/Audit Files
2. PREA Compliance Audit Instrument Checklist
3. Notification Form

B. Interviews

1. PREA Coordinator

The following delineates the audit findings regarding this standard:

115.81 (a) and (b) The John I. Easley Criminal Complex is not a prison; therefore, the facility is exempt with this part of the standard during this audit.

115.81 (c) and (d) If the screening indicates the inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, the Medical Staff at the John I. Easley Criminal Justice Center ensures the inmate is offered a follow-up meeting with the medical and/or mental health staff within 14 days of the intake screening as required by this part of the standard. Williamson County maintains a contract with Southern Health Partners for mental health services. All inmates are required to be seen by the medical staff within 14 day from intake is required by the Tennessee Corrections Institute. Contracted Medical Staff will refer inmates as needed to Southern Health Partners Staff for mental health services. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.81 (d) John I. Easley Criminal Justice Center requires that any information related to sexual victimization or abusiveness that occurred in the facility is strictly limited to medical and mental health practitioners and other staff, as necessary, to inform treatment plans and security and management decisions, including housing, bed, work, education, and program assignments, or as otherwise required by Federal, State, or local law. Interviews with the contracted Medical Staff corroborate this practice. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.81 (e) John I. Easley Criminal Justice Center requires contracted Medical Staff to obtain informed consent from inmates before reporting information about prior sexual victimization that did not occur in the facility, unless the inmate is under the age of 18. The John I. Easley Criminal Justice Center

has not housed an inmate under the age of 18 in the past 12 months. This was confirmed during an interview with the PREA Coordinator and by the auditor's observations during the onsite visit. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

Standard 115.82: Access to emergency medical and mental health services

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.82 (a)

- Do inmate victims of sexual abuse receive timely, unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which are determined by medical and mental health practitioners according to their professional judgment?
☒ Yes ☐ No

115.82 (b)

- If no qualified medical or mental health practitioners are on duty at the time a report of recent sexual abuse is made, do security staff first responders take preliminary steps to protect the victim pursuant to § 115.62? ☒ Yes ☐ No
- Do security staff first responders immediately notify the appropriate medical and mental health practitioners? ☒ Yes ☐ No

115.82 (c)

- Are inmate victims of sexual abuse offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate? ☒ Yes ☐ No

115.82 (d)

- Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident?
☒ Yes ☐ No

Auditor Overall Compliance Determination

- ☐ **Exceeds Standard** (*Substantially exceeds requirement of standards*)
- ☒ **Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- ☐ **Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

Evidence Reviewed:

A. Documents

1. Williamson County Sheriff's Office Pre-Audit Questionnaire/Audit Files
2. PREA Compliance Audit Instrument Checklist
3. Williamson County Sheriff's Office General Order 10.6.002 PREA page 19

B. Interviews

1. PREA Coordinator
2. Medical Staff

The following delineates the audit findings regarding this standard:

115.82 The Williamson County Sheriff's Office General Order 10.6.002 page 19, PREA details the agency's commitment to compliance. (a) John I. Easley Criminal Justice Center has a Memorandum of Understanding in place with Sexual Assault Center of Nashville to treat inmate victims of sexual abuse. The facility also has medical and mental health staff at the facility ensuring inmates receive timely, unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which are determined by medical and mental health practitioners according to their professional judgment. Other services available include Williamson Medical Center and Mobile Crisis Counseling. This practice was corroborated through an interview with the medical staff. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.82 (b) John I. Easley Criminal Justice Center has procedures to follow when no qualified medical or mental health practitioners are on duty at the time a report of recent abuse is made, security staff first responders take preliminary steps to protect the victim and shall immediately notify the appropriate medical and mental health practitioners. During the past twelve months, there have been eleven total alleged victims of sexual abuse at the John I. Easley Criminal Justice Complex. This practice was corroborated through an interview with the Medical Staff. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.82 (c) The Williamson County Sheriff's Office General Order 10.6.002 page 19, PREA details the agency's commitment to compliance. John I. Easley Criminal Justice Center ensures inmate victims of sexual abuse while incarcerated are offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate. During the past twelve months, there have been eleven alleged victims of sexual abuse at the John I. Easley Criminal Justice Center. This was confirmed during an interview with the PREA Coordinator. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.82 (d) John I. Easley Criminal Justice Center requires that all treatment services provided to the victim are without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident. This practice was corroborated through an interview with the Medical Staff. During the past twelve months, there have been eleven reported victims of sexual abuse at the John I. Easley Criminal Justice Center. This was confirmed

during an interview with the PREA Coordinator. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

Standard 115.83: Ongoing medical and mental health care for sexual abuse victims and abusers

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.83 (a)

- Does the facility offer medical and mental health evaluation and, as appropriate, treatment to all inmates who have been victimized by sexual abuse in any prison, jail, lockup, or juvenile facility? ☒ Yes ☐ No

115.83 (b)

- Does the evaluation and treatment of such victims include, as appropriate, follow-up services, treatment plans, and, when necessary, referrals for continued care following their transfer to, or placement in, other facilities, or their release from custody? ☒ Yes ☐ No

115.83 (c)

- Does the facility provide such victims with medical and mental health services consistent with the community level of care? ☒ Yes ☐ No

115.83 (d)

- Are inmate victims of sexually abusive vaginal penetration while incarcerated offered pregnancy tests? (N/A if "all-male" facility. *Note: in "all-male" facilities, there may be inmates who identify as transgender men who may have female genitalia. Auditors should be sure to know whether such individuals may be in the population and whether this provision may apply in specific circumstances.*) ☒ Yes ☐ No ☐ NA

115.83 (e)

- If pregnancy results from the conduct described in paragraph § 115.83(d), do such victims receive timely and comprehensive information about and timely access to all lawful pregnancy-related medical services? (N/A if "all-male" facility. *Note: in "all-male" facilities, there may be inmates who identify as transgender men who may have female genitalia. Auditors should be sure to know whether such individuals may be in the population and whether this provision may apply in specific circumstances.*) ☒ Yes ☐ No ☐ NA

115.83 (f)

- Are inmate victims of sexual abuse while incarcerated offered tests for sexually transmitted infections as medically appropriate? ☒ Yes ☐ No

115.83 (g)

- Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident?
☒ Yes ☐ No

115.83 (h)

- If the facility is a prison, does it attempt to conduct a mental health evaluation of all known inmate-on-inmate abusers within 60 days of learning of such abuse history and offer treatment when deemed appropriate by mental health practitioners? (NA if the facility is a jail.)
☐ Yes ☐ No ☒ NA

Auditor Overall Compliance Determination

- ☐ **Exceeds Standard** (*Substantially exceeds requirement of standards*)
- ☒ **Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- ☐ **Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

Evidence Reviewed:

- A. Documents
 1. Williamson County Sheriff's Office Pre-Audit Questionnaire/Audit Files
 2. PREA Compliance Audit Instrument Checklist
 3. Williamson County Sheriff's Office General Order 10.2.006 PREA page 19
 4. Medical and Mental Health Records
- B. Interviews
 1. Medical and Mental Health Staff

The following delineates the audit findings regarding this standard:

115.83 (a) The Williamson County Sheriff's Office General Order 10.6.002 page 19, details the agency's commitment to compliance. John I. Easley Criminal Justice Center offers medical and mental health evaluations and, as appropriate, treatment to all inmates who have been victimized by sexual abuse in any facility. In the past 12 months, there was one incident where these services needed to be utilized. This was confirmed during an interview with a medical staff member. Staff was well versed if an incident did occur. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.83 (b) John I. Easley Criminal Justice Center mandates that the evaluations and treatment of such victims include, as appropriate, follow-up services, treatment plans, and, when necessary, referrals for continued care following their transfer to, or placement in, other facilities, or their release from custody. In the past 12 months, there was one incident where these services needed to be utilized. Staff was well versed if an incident did occur. This was confirmed during an interview with a medical staff member. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.83 (c) The Williamson County Sheriff's Office General Order 10.6.002 page 19, states John I. Easley Criminal Justice Center requires that medical and mental health staff provide all victims with medical and mental health services consistent with the community level of care. This practice was corroborated through an interview with the medical staff. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.83 (d and e) Based on John I. Easley Criminal Justice Center documentation requires inmate victims of sexually abusive vaginal penetration, while incarcerated, shall be offered pregnancy tests and timely information about, and access to, all pregnancy-related medical services that are lawful in the community as required by this standard. In the past 12 months, there was one incident where these services needed to be utilized. This was confirmed during an interview with a medical staff member. Staff was well versed if an incident did occur. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.83 (f) The Williamson County Sheriff's Office General Order 10.6.002 page 19, states the John I. Easley Criminal Justice Center requires that medical and mental health staff provide inmate victims of sexual abuse while incarcerated tests for sexually transmitted infections as medically appropriate. In the past 12 months, there was one incident where these services needed to be utilized. Staff was well versed if an incident did occur. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.83 (g) The Williamson County Sheriff's Office General Order 10.6.002 page 19, states the John I. Easley Criminal Justice Center requires that medical and mental health staff provide treatment services to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident. In the past 12 months, there was one incident where these services needed to be utilized. Staff was well versed if an incident did occur. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

DATA COLLECTION AND REVIEW

Standard 115.86: Sexual abuse incident reviews

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.86 (a)

- Does the facility conduct a sexual abuse incident review at the conclusion of every sexual abuse investigation, including where the allegation has not been substantiated, unless the allegation has been determined to be unfounded? ☒ Yes ☐ No

115.86 (b)

- Does such review ordinarily occur within 30 days of the conclusion of the investigation? ☒ Yes ☐ No

115.86 (c)

- Does the review team include upper-level management officials, with input from line supervisors, investigators, and medical or mental health practitioners? ☒ Yes ☐ No

115.86 (d)

- Does the review team: Consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse? ☒ Yes ☐ No
- Does the review team: Consider whether the incident or allegation was motivated by race; ethnicity; gender identity; lesbian, gay, bisexual, transgender, or intersex identification, status, or perceived status; gang affiliation; or other group dynamics at the facility? ☒ Yes ☐ No
- Does the review team: Examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse? ☒ Yes ☐ No
- Does the review team: Assess the adequacy of staffing levels in that area during different shifts? ☒ Yes ☐ No
- Does the review team: Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff? ☒ Yes ☐ No
- Does the review team: Prepare a report of its findings, including but not necessarily limited to determinations made pursuant to §§ 115.86(d)(1) - (d)(5), and any recommendations for improvement and submit such report to the facility head and PREA compliance manager? ☒ Yes ☐ No

115.86 (e)

- Does the facility implement the recommendations for improvement, or document its reasons for not doing so? ☒ Yes ☐ No

Auditor Overall Compliance Determination

- ☐ **Exceeds Standard** (*Substantially exceeds requirement of standards*)
- ☒ **Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- ☐ **Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

Evidence Reviewed:

A. Documents

1. Williamson County Sheriff's Office Pre-Audit Questionnaire/Audit Files
2. PREA Compliance Audit Instrument Checklist
3. Williamson County Sheriff's Office General Order 10.6.002 pages 15 and 16
4. Incident Review Form

B. Interviews

1. Jail Administrator
2. PREA Coordinator
3. Incident Review Team Members

The following delineates the audit findings regarding this standard:

115.86 (a) Williamson County Sheriff's Office General Order 10.6.002 pages 15 states that the John I. Easley Criminal Justice Center conducts a sexual abuse incident review at the conclusion of every sexual abuse investigation, including where the allegation has not been substantiated, unless the allegation has been determined to be unfounded. This process would be documented by utilizing the "Sexual Abuse Incident Review Report". Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.86 (b) John I. Easley Criminal Justice Center ensures that these reviews occur within 30 days of the conclusion of the investigation and documents the review on the "Sexual Abuse Incident Review Report" form. During the past twelve months, there have been five sexual abuse investigations that were either substantiated or unsubstantiated at the John I. Easley Criminal Justice Center; therefore there were five Sexual Abuse Incident Reviews completed. This process was confirmed during interviews with members of the review team. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.86 (c) The review team consist of upper-level management officials, with input from line supervisors, investigators, and medical or mental health practitioners. Team members were confirmed by the PREA Coordinator. During the past twelve months, there have been five sexual abuse investigations that were either substantiated or unsubstantiated at the John I. Easley Criminal Justice Center; therefore there were five Sexual Abuse Incident Reviews completed. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.86 (d) Williamson County Sheriff's Office General Order 10.6.002 pages 15 states that the review team considers whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse; whether the incident or allegation was motivated by race; ethnicity; gender identity; lesbian, gay, bisexual, transgender, or intersex identification, status, or perceived status; or gang affiliation; or was motivated or otherwise caused by other group dynamics at the facility; and they examine the area in John I. Easley Criminal Justice Center where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse; assess the adequacy of staffing levels in that area during different shifts; assess whether monitoring technology should be deployed or augmented to supplement supervision by staff. The agency has deployed an excellent PREA after action review form which addresses all elements of the standard. This process would be documented by utilizing the Williamson County Sheriff's Office "Sexual Abuse Incident Review Form". Therefore, the facility exceeds the intent of this part of the standard.

115.86 (e) John I. Easley Criminal Justice Center shall implement the recommendations for improvement, or shall document its reasons for not doing so. During the past twelve months, there have been five reported victims of sexual abuse at the John I. Easley Criminal Justice Center that were substantiated or unsubstantiated; the facility provided the auditor with copies of Sexual Abuse Incident Review Forms. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

Standard 115.87: Data collection

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.87 (a)

- Does the agency collect accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions? ☒ Yes ☐ No

115.87 (b)

- Does the agency aggregate the incident-based sexual abuse data at least annually?
☒ Yes ☐ No

115.87 (c)

- Does the incident-based data include, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence conducted by the Office of Justice? ☒ Yes ☐ No

115.87 (d)

- Does the agency maintain, review, and collect data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews?
☒ Yes ☐ No

115.87 (e)

- Does the agency also obtain incident-based and aggregated data from every private facility with which it contracts for the confinement of its inmates? (N/A if agency does not contract for the confinement of its inmates.) ☐ Yes ☐ No ☒ NA

115.87 (f)

- Does the agency, upon request, provide all such data from the previous calendar year to the Office of Justice no later than June 30? (N/A if DOJ has not requested agency data.)
☐ Yes ☐ No ☒ NA

Auditor Overall Compliance Determination

- ☐ **Exceeds Standard** (*Substantially exceeds requirement of standards*)
- ☒ **Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- ☐ **Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

Evidence Reviewed:

- A. Documents
1. Williamson County Sheriff's Office Pre-Audit Questionnaire/Audit Files
 2. PREA Compliance Audit Instrument Checklist
 3. Williamson County Sheriff's Office General Order 10.6.002 page 16
- B. Interviews
1. PREA Coordinator

The following delineates the audit findings regarding this standard:

115.87 The Williamson County Sheriff's Office General Order 10.6.002 page 16, details the agency's commitment to compliance. (a), (b) and (c) John I. Easley Criminal Justice Center collects accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions, and aggregates the incident-based sexual abuse data at least annually. Therefore, the facility demonstrated compliance with this part of the standard during this audit. The incident-based data collected is based on the most recent version of the Survey of Sexual Violence conducted by the Office of Justice. This process was confirmed by the PREA Coordinator. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.87 (d) John I. Easley Criminal Justice Center maintains, reviews, and collects data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews. During the past twelve months there has been forty five reports of sexual abuse

and sexual harassment. The agency does have PREA monthly statistic reports available for usage. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.87 (e) John I. Easley Criminal Justice Center does not contract its inmates to other facilities. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.87 (f) Upon request, John I. Easley Criminal Justice Center provides all such data from the previous calendar year to the Office of Justice no later than June 30th when required. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

Standard 115.88: Data review for corrective action

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.88 (a)

- Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Identifying problem areas? ☒ Yes ☐ No
- Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Taking corrective action on an ongoing basis? ☒ Yes ☐ No
- Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Preparing an annual report of its findings and corrective actions for each facility, as well as the agency as a whole? ☒ Yes ☐ No

115.88 (b)

- Does the agency's annual report include a comparison of the current year's data and corrective actions with those from prior years and provide an assessment of the agency's progress in addressing sexual abuse ☒ Yes ☐ No

115.88 (c)

- Is the agency's annual report approved by the agency head and made readily available to the public through its website or, if it does not have one, through other means? ☒ Yes ☐ No

115.88 (d)

- Does the agency indicate the nature of the material redacted where it redacts specific material from the reports when publication would present a clear and specific threat to the safety and security of a facility? ☒ Yes ☐ No

Auditor Overall Compliance Determination

- ☐ **Exceeds Standard** (*Substantially exceeds requirement of standards*)
- ☒ **Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- ☐ **Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

Evidence Reviewed:

A. Documents

1. Williamson County Sheriff's Office Pre-Audit Questionnaire/Audit Files
2. PREA Compliance Audit Instrument Checklist
3. Williamson County Sheriff's Office General Order 10.6.002 PREA page 16
4. Annual Report

B. Interviews

1. PREA Coordinator

The following delineates the audit findings regarding this standard:

115.88 (a) The Williamson County Sheriff's Office General Order 10.6.002 page 16, details the agency's commitment to compliance. John I. Easley Criminal Justice Center reviews data collected to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including identifying problem areas; taking corrective action on an ongoing basis; and preparing an annual report of its findings and corrective actions for each facility, as well as John I. Easley Criminal Justice Center as a whole. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.88 (b) Such reports includes a comparison of the current year's data and corrective actions with those from prior years and provide an assessment of John I. Easley Criminal Justice Center's progress in addressing sexual abuse. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.88 (c) John I. Easley Criminal Justice Center's report is approved by the Sheriff and made readily available to the public by posting in the lobby of the facility. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.88 (d) John I. Easley Criminal Justice Center may redact specific material from the reports when publication would present a clear and specific threat to the safety and security of the facility, but must indicate the nature of the material redacted. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

Standard 115.89: Data storage, publication, and destruction

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.89 (a)

- Does the agency ensure that data collected pursuant to § 115.87 are securely retained?
☒ Yes ☐ No

115.89 (b)

- Does the agency make all aggregated sexual abuse data, from facilities under its direct control and private facilities with which it contracts, readily available to the public at least annually through its website or, if it does not have one, through other means? ☒ Yes ☐ No

115.89 (c)

- Does the agency remove all personal identifiers before making aggregated sexual abuse data publicly available? ☒ Yes ☐ No

115.89 (d)

- Does the agency maintain sexual abuse data collected pursuant to § 115.87 for at least 10 years after the date of the initial collection, unless Federal, State, or local law requires otherwise? ☒ Yes ☐ No

Auditor Overall Compliance Determination

- ☐ **Exceeds Standard** (*Substantially exceeds requirement of standards*)
- ☒ **Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- ☐ **Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

Evidence Reviewed:

A. Documents

1. Williamson County Sheriff's Office Pre-Audit Questionnaire/Audit Files
2. PREA Compliance Audit Instrument Checklist

B. Interviews

1. PREA Coordinator

The following delineates the audit findings regarding this standard:

115.89 (a) through (d) John I. Easley Criminal Justice Center PREA Coordinator makes all aggregated sexual abuse data, readily available to the public at least annually by posting in the lobby of the jail.

All reports are securely retained and maintained for at least 10 years after the date of the initial collection unless Federal, State, or Local law requires otherwise. This was confirmed during an interview with the PREA Coordinator. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

AUDITING AND CORRECTIVE ACTION

Standard 115.401: Frequency and scope of audits

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.401 (a)

- During the prior three-year audit period, did the agency ensure that each facility operated by the agency, or by a private organization on behalf of the agency, was audited at least once? (*Note: The response here is purely informational. A "no" response does not impact overall compliance with this standard.*) ☒ Yes ☐ No

115.401 (b)

- Is this the first year of the current audit cycle? (*Note: a "no" response does not impact overall compliance with this standard.*) ☒ Yes ☐ No
- If this is the second year of the current audit cycle, did the agency ensure that at least one-third of each facility type operated by the agency, or by a private organization on behalf of the agency, was audited during the first year of the current audit cycle? (N/A if this is **not** the *second* year of the current audit cycle.) ☒ Yes ☐ No ☐ NA
- If this is the third year of the current audit cycle, did the agency ensure that at least two-thirds of each facility type operated by the agency, or by a private organization on behalf of the agency, were audited during the first two years of the current audit cycle? (N/A if this is **not** the *third* year of the current audit cycle.) ☒ Yes ☐ No ☐ NA

115.401 (h)

- Did the auditor have access to, and the ability to observe, all areas of the audited facility?
☒ Yes ☐ No

115.401 (i)

- Was the auditor permitted to request and receive copies of any relevant documents (including electronically stored information)? ☒ Yes ☐ No

115.401 (m)

- Was the auditor permitted to conduct private interviews with inmates, residents, and detainees? ☒ Yes ☐ No

115.401 (n)

- Were inmates permitted to send confidential information or correspondence to the auditor in the same manner as if they were communicating with legal counsel? ☒ Yes ☐ No

Auditor Overall Compliance Determination

- ☐ **Exceeds Standard** (*Substantially exceeds requirement of standards*)
- ☒ **Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- ☐ **Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

115.401 (a) and (b) The John I. Easley Criminal Justice Center did have a PREA audit during the first audit cycle. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.401 (h) The auditor has full access to all location/areas of the John I. Easley Criminal Justice Center. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.401 (i) The auditor did obtain all necessary copies of audit items. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.401 (m) The auditor was allowed to interview inmates in a private setting. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.401 (n) The auditor did not receive any correspondence from any Williamson County inmates. Audit notices were observed in every housing unit; as well as all common areas and lobby. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

Standard 115.403: Audit contents and findings

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.403 (f)

- The agency has published on its agency website, if it has one, or has otherwise made publicly available, all Final Audit Reports. The review period is for prior audits completed during the past three years PRECEDING THIS AUDIT. The pendency of any agency appeal pursuant to 28 C.F.R. § 115.405 does not excuse noncompliance with this provision. (N/A if there have been no Final Audit Reports issued in the past three years, or in the case of single facility agencies that there has never been a Final Audit Report issued.) ☒ Yes ☐ No ☐ NA

Auditor Overall Compliance Determination

- ☐ **Exceeds Standard** (*Substantially exceeds requirement of standards*)
- ☒ **Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- ☐ **Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

115.403 John I. Easley Criminal Justice Center has had a PREA audit in 2017; the final report is posted on the agency's website [http://www.williamsoncounty-tn.gov/1741/PREA -Info](http://www.williamsoncounty-tn.gov/1741/PREA-Info). Therefore, the facility demonstrated compliance with this part of the standard during this audit.

AUDITOR CERTIFICATION

I certify that:

- ☒ The contents of this report are accurate to the best of my knowledge.
- ☒ No conflict of interest exists with respect to my ability to conduct an audit of the agency under review, and
- ☒ I have not included in the final report any personally identifiable information (PII) about any inmate or staff member, except where the names of administrative personnel are specifically requested in the report template.

DOJ Certified Auditor:

Brian D. Bivens

September 2, 2020

Auditor Signature

Date